

Hon. Cathy Seibel
United States District Court Judge
United States Courthouse
300 Quarropas Street
White Plains, New York 10601

Virginia Blanco 79564-054
33 1/2 Pembroke Rd
Danbury, CT 06811

January 18, 2022

Re: U.S.A v. Blanco
16 Cr. 408 (CS)
28 U.S.C. § 2255

Dear Judge Seibel,

Virginia Blanco, pursuant to Rule 7 of the Federal Rules Governing Section 2255 Proceedings, respectfully requests that the record herein be expanded to include each item of authenticated evidence set forth in Ms. Blanco's reply to the Government's response.

GIOVANNI MARTE:

On several occasions in the Government's reply the Government reverts to Marte's testimony as inconsistencies. What the Government alleges are inconsistencies Ms. Blanco can prove are subornation of perjury.

The claims are instances when Assistant United States Attorney's Samuel S. Adelsberg and Jamie E. Bagliebter allowed two cooperating Government witnesses Giovanni Marte and Jeffrey Martinez to commit subornation of Perjury; (2) instances when Assistant United States Attorney's Samuel S. Adelsberg, Jamie E. Bagliebter and Douglas Zolkind were present during Giovanni Marte proffer meetings; (3) instances when Assistant United States Attorney Douglas Zolkind were present during Jeffrey Martinez proffer meeting; (4) instances when Assistant United States Attorney's Samuel S. Adelsberg, Jamie E. Bagliebter and Douglas Zolkind had prior knowledge of proffered materiel; (5) instances when Assistant United States Attorney's Samuel S. Adelsberg, Jamie E. Bagliebter and Douglas Zolkind used perjured testimony in the Government's rule 29 and rule 32 motions; (6) instances when Assistant United States Attorney's Samuel S. Adelsberg, Jamie E. Bagliebter and Douglas Zolkind used perjured testimony in the Government's appeal; (7) instances when United States Attorney Geoffrey S. Berman signed and dated and submitted the Government's rule 29 and rule 32 motion with perjured testimony arguments for Government grounds; (8) instances when Assistant United States Attorney's Samuel S. Adelsberg and Jamie E. Bagliebter used perjured testimony in the Government's 28 U.S.C. § 2255 reply.

The Government was aware or should have been aware or should have known of Marte and Martinez testimony was perjured due to the fact they were present in the majority of both their proffer meetings and through 3500 materiel.

Furthermore, the Government claims Marte testified at length about his involvement in drug dealing, shootouts and gun possession. Ms. Blanco also wishes to expand the record to prove the Government's claim to be false.

The Claim of shootouts is untruthful:

On June 29, 2018, during Marte's 3502-PP witness prep:

The initials S.A and J.B in the top right corner are abbreviations for AUSA Sam Adelsberg and AUSA Jamie Bagliebter. Proving both AUSA's Adelsberg and Bagliebter were present during this meeting.

In this prep meeting Marte alleges:

Committed a shootout w/ Smiley B/C they broke his car window. (see attachment 3502 -PP. page 1)

However, while testifying Marte states:

Q. You testified earlier that you were involved in three shootouts. When were these shootouts?

A. One was in 2008. One was in 2009. The last one was in 2013.

Q. And who was involved in these shootouts?

A. Just the Tito and some other guys that I grew up with.

A. Did you ever have a shootout against anyone other than the Trinitarios gang?

A. No

Lines 11-19 page 123 Doc.142.

On June 5, 2018, during Marte's 3502-MM witness prep the initials S.A and J.B in the top right corner are abbreviations for AUSA Sam Adelsberg and AUSA Jamie Bagliebter. Proving both AUSA's Adelsberg and Bagliebter were present during this meeting.

Marte admits in the meeting to only being in:

3 shootouts w/ Trinitarios.

3502-MM

The claim of gun possession is untruthful:

Q. Did you ever try to sell a gun for \$850?

A. Can you repeat that?

Q. Did you ever try to sell any guns?

A. I don't sell guns.

Lines 17-20 page 246 Doc 142.

On August 12, 2015, a FD-302 interview with a confidential informant states:

Gio (known to the FBI as Giovanny Marte) offered to sell (redacted) a firearm for \$850.

The Claim of drug dealing is untruthful:

The Government could not establish a solid timeline or produce any evidence or a single witness to corroborate Marte's alleged drug operation outside of 90 Ellwood with Carlos Raposo.

Everyone that was implicate by Marte in that alleged drug operation and who Marte allegedly split proceeds with in the alleged drug operation was arrested except Marte. (See 3502-pp spot got raided so they shut it down) (See 3502-pp first fight over a spot Ellwood & 96).

It has been established that the Government nor Ms. Blanco's attorney Jon Silveri interviewed Carlos Raposo or anyone else to corroborate or discredited Marte's allegations.

In Marte's 3502-R proffer on Page five (5) Marte alleges he had another drug operation in the year of 2014 until 2016:

Worked with Jonathan Santos from 2014-16 ish.

Shared product- pills, coke, weed.

Shared customers.

Ivan Brea AKA Tito - also part of partner.

Everyone had own business, but helped e/o out.

Had weed spot on Ellwood

also pills, coke.

Had spot about 2014-16.

Hundreds of customers.

However, Marte's 3502-PP proffer notes states: "Only spot that GM had."

The only spot referring to the spot with Raposo. Now another drug spot with Jonathan Santos and Ivan Brea.

In that time frame both Jonathan Santos and Ivan Brea were arrested for narcotics except Marte.

New York City Police Department Police Reports for Jonathan Santos states he was arrested On February 3, 2016 for PL 220.16 01 criminal possession of a controlled substance with intent to sell 3rd degree, 2221.20 criminal possession of marijuana -3rd: 8oz.

(See attachment)

Department of Corrections and Community Supervision show. Jonathan Santos D.O.B 06/16/86 AKA Bodie with a Department Identification Number 16-R-2725.

(See attachment)

In a June 25, 2021 letter from the Government to the sentencing Judge regarding Ivan Brea AKA Tito:

In 2014, Brea was was convicted of criminal sale of a controlled substance in the third degree and sentenced to 18 months' imprisonment. PSR 41. He violated his parole a second time in 2016. (See attachment)

Department of Corrections and Community Supervision show. Ivan Brea D.O.B 02/13/91 AKA Tito was incarcerated at Hale Creek Asactc. Department Identification Number 14-R-1707. With a CDR to parole 06/19/15.
(See attachment)

To reiterate Ms. Blanco's argument, of Marte claiming he was in a drug distribution with Raposo, but wasn't arrested with others as he named, is the same uncorroborated allegation here.

Department of Corrections and Community Supervision Records for Carlos Raposo shows that Carlos Raposo had a DIN # (Department Identification Number) of 12-A-3783 and Anthony DeLeon had a 11-R-3508 DIN number.

Trial testimony inconsistencies from Marte on his drug dealing in the years of 2014-2016 stating he did not work with anyone in that time frame.

Q. And by the way, did you have anybody working for you in 2014 or were an independent?

A. No. I was always independent.

Page 212 lines 8-10 Doc 142.

Q. And you weren't working for anyone either, correct?

A. Which drug?

Q. Cocaine

A. No

Q. And you had no one working for you either, right?

A. No.

Page 212,213 lines 19-25, line 1 Doc 142

Q. Before you were arrested in May of 2016, while you were doing the Herbal Life you were still selling drugs, correct?

A. Yes, but not as much.

Q. And that drug at the time in 2016 was?

A. Cocaine, pills, marijuana.

Page 223 lines 8-13 Doc 142.

The question remains the same and unanswered by the government an Mr. Adelsberg:

On July 3, 2018 at final Pretrial what research was Mr. Adelsberg referring to?

Ms. Blanco has provided proof that discredits Marte and the Government's allegations. Marte nor the Government can produce one single piece of evidence or any witness to corroborate what Marte is alleging.

In conclusion the Government argues photos of Ms. Blanco and Marte and there children as evidence. The Government claims these photos were taken during the time of the robbery. However, the Government fails to show a date or time on the photos to be able to come to that conclusion or who actually provided the photos to the Government.

Inconsistencies on how the Government obtained the pictures of Ms. Blanco and Marte and their children is a unanswered question. Who provided the pictures to the Government was it Jonah Marte or Marylin Marte? Furthermore, the Government argues without a time stamp or a date stamp on the pictures that the pictures were during the time of the robbery. The only alleged authentic time frame comes from Marte himself during his testimony. Moreover Marte's mother Marilyn Marte provided private investigator Kenny Davis a Dominican republic identification card with another name besides hers (see attached) listed on it during a interview stating she gave the pictures to Marte's lawyer. On April 23, 2018 (See attached 3502-BB) in a proffer meeting Giovanni Marte states: There was a room with the files. On April 19, 2018 (see attached 3508-D) in a meeting with the Government Jonah Marte states: photo strip #1 Marte, VB, Adrian, Marte's son, #2 VB, Marte and #3 VB, Adrian, Nathaniel.

The Government must be able to provide a time frame when the pictures were taken, as well the Government has to make clear who provided the pictures to them.

Furthermore, another allegation by Marte that was uncorroborated was how Ms. Blanco has a niece when Ms. Blanco's only sister Yokasta Blanco does not have children. Again Mr. Adelsberg what research did you do?

Marte's April 16, 2018 3502-Y proffer note states:

GM gave VB gun in '09 to have her keep it at Ellwood after nieces birthday party.

Ms. Blanco's sister Yokasta Blanco does not have a daughter. In fact, Yokasta Blanco does not have any kids at all. Therefore, Marte's alleged allegations that he gave Ms. Blanco a gun in 2009 and she kept a gun on Ellwood after her niece's birthday party falls short.

On January 10, 2015 and January 19, 2015, Giovanni Marte was arrested for two separate charges of AVO 3rd. (See 3502-S on page three Douglas Zolkind was present)

Please see attached letters dated: October 6, 2021, November 2, 2021 and January 11, 2021.

Marte never disclosed the two arrests to the court.

JEFFREY MARTINEZ:

The Government argues the truthfulness of Jeffrey Martinez testimony. Multiple examples prove his testimony to be untruthful.

1. On direct Jeffery Martinez was asked by Ms. Bagliebter the following:

Q. Have you ever been arrested?

A. Yes.

Q. How many times?

A. Once.

Q. When?

A. 2015.

Doc 144. Page. 327.

Jeffrey Martinez 3503-B, proves Martinez was arrested ten times.

On page one (1) of Jeffrey Martinez personal history of defendant form (USM-312) the AUSA assigned is Zolkind. On page four (4) Jefferey Martinez prior arrests: NYPD 03/13/15 CPW 4, NYPD 03/11/10 TO3 and NYPD 04/03/10 Burglary.

2. Jeffrey Martinez testimony inconsistencies about the return of the firearms used for the robbery. Martinez co - conspirator Andres Cruz stating Martinez sold the firearm in Brooklyn. Jeffrey Martinez never testified to selling a firearm and never disclosed it in his proffer meetings.

Martinez returned both guns that were used in the robbery. He gave the 9mm back to his cousin Fernandez with \$500 for letting him use it. He also gave the revolver back to Metra, but found out later that it was sold. (Martinez 3502-V).

On June 14, 2016 in a FD-302 statement Cruz stated:

Approximately one to three days after the robbery, Martinez brought the revolver used in the bank robbery to Cruz' house. Martinez said he was scared to keep the gun at Martinez' house in case he was identified because Martinez, unlike Cruz, had entered the bank during the robbery. Cruz kept the gun for a few days then Martinez took the gun back and said he was going to sell the gun. Martinez later told Cruz he sold the gun in Brooklyn. Martinez never said anything to Cruz about the second gun used in the robbery. (June 14, 2016 FD-302 Cruz)

3. Jeffrey Martinez told a confidential informant about a home invasion he did on the evening of March 20, 2016 in New Jersey. Martinez did not testify about the home invasion nor did Martinez disclose it during his proffer meetings.

Q. Have you ever stolen money from someone other than a drug customer?

A. No

Q. When you would steal money -- sorry. Other than the bank robbery, have you ever stolen money from someone other than a drug customer?

A. No.

Lines 3-9 doc144. Page 325.

3503-DDD Jeffrey Martinez told CHS that Martinez committed a home invasion robbery on the evening of March 20, 2016 in New Jersey. Martinez stole the money that was owed to him and additional money.

4. When asked about the recruitment of Andres Cruz Jefferey Martinez testified he only tried to recruit him on the day of the robbery. Marte's Proffer and testimony as well as Cruz's June 15, 2016 FD-302 prove Martinez testimony was false.

Q. Okay. So, did you ever try to recruit Andres Cruz?

A. The day of the robbery.

Q. So the first time you guys tried to get Andres Cruz to join the robbery was the day of the robbery?

A. Yes.

(TT 144 P. 115) Martinez

On January 18, 2017 Giovanny Marte's proffer 3502-N. Marte wanted to recruit three to five others in total to commit the robbery to include a driver and others to watch the exits and the offices in the bank while Marte dealt with the bank employees and the vault. Approximately four to six weeks before the robbery, Marte asked Martinez to find someone and Martinez recruited Andres aka 50 (known to the FBI as Andres Cruz and hereinafter referred to as Cruz). Martinez said Cruz agreed to drive. Martinez told Cruz it was a robbery of a cashier, not a bank.

Q. Other than Jeff, who was originally recruited to rob the bank?

A. Some guy named Tito and Fifty.

(TT 142 P. 174) Marte.

Q. And at that point who was driving the car?

A. Fifty

(TT 142. P. 181)

On the day before the bank robbery, Cruz received a telephone call from Jeffrey Martinez. Martinez asked Cruz where he was located and arranged to meet Cruz. Cruz then met Gio (known to the FBI as Giovanny Marte) and Martinez on the street in Washington Heights. Marte and Martinez were in a Nissan, the same car that was used during the robbery the following day, and asked Cruz to get in the car. Marte was driving the car. Marte and Martinez told Cruz they wanted Cruz they wanted Cruz to drive for a bank robbery. Marte and Martinez said they had another person who was supposed to act as the driver but that person backed out.

Talked to 50 before the robbery - said he was going to do it 50 offered to be driver before. Page 1. 3503-FFF.

The exhibits attached support perjury claims brought forth in Ms. Blanco's 28 U.S.C. § 2255 reply motion. This is in clear violation of Ms. Blanco's sixth and fourteenth amendment rights. Most salient to Ms. Blanco's argument the Government was aware or knew or should have been aware of the perjury. Besides Ms. Blanco's supported perjury claim, Ms. Blanco brings forth an abundance more.

Ms. Blanco respectfully requests the court appoints council and grants this motion and holds a hearing on the above matters.

Respectfully Submitted,

Virginia Blanco

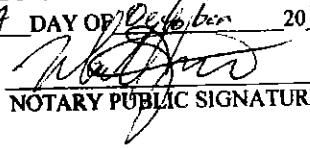
VB 01/17/22

I, Ken Davis, initiated the below investigations, as a private investigator. The following interviewees included Marilyn Marte (Mother of Geovanni Marte, aka GEO) and Bentez Marte (Mother of Marilyn Marte).

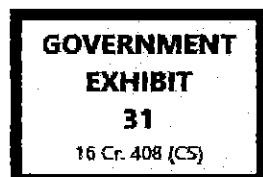
February 19, 2019 At approximately 1300 hours, I responded to 1 Bogardus Place, apt 4L, New York, NY 10040. While there, I showed Marilyn Marte three governmental photographs (#31, #32 and #33). M. Marte related that she obtained these photographs from within her apartment and gave these photos to her son's lawyer (Name unknown at this time/a Cuban Guy). She signed and dated these photographs as additional proof. Note: her identification card (DR-Election) does have a true picture of her, but the name on this identification card is Paula Perez, Hiciano. I included a photo-copy of the DR-Election, along with the signed governmental photographs (#31, #32, and #33).

March 7, 2019 At approximately 0935 hours; At the request of my client of interest, I sent two emails to Attorney Steven Lewis (slewis@sbrllaw.com). The first email included an attachment of my Curriculum Vitae (CV), The second email included a copy of my NYS private investigator's license (ID# 11000198703).

At approximately 1215 hours; My client of interest advised me to respond to 1 Bogardus Place to re-interview Marilyn Marte at apt 4L. This time I responded with a Hispanic translator (Carmen Lopez). Her duties were just to translate. While there we met with Bentez Marte, the mother of M. Marte. She related that M. Marte will not be back until 6PM. At 19:45 hours, on this same day, we (C. Lopez and I) responded back to the above location. A woman answered at the door after our continuous knocking. She did not open it and asked who is it. We were not sure if it was Marilyn Marte (Mother of Geovanni Marte, aka GEO) or Bentez Marte (Mother of Marilyn Marte). After identifying ourselves, the television was turn off. In response to this suspicious activity, I eventually called this number (1.347.630.6115) and left a message. We, C. Lopez and I, waited at this door (apt 4L) for approximately 5-10 minutes. In which still, no one answered the door. So, we left.


SUBSCRIBED & SWORN BEFORE ME
27 DAY OF October 2021

NOTARY PUBLIC SIGNATURE

Mark Hynes
NOTARY PUBLIC STATE OF NEW YORK
Registration No. 01HY6264530
Qualified in Westchester County
Commission Expires October 17, 2024



PP 2/19/19 110 pm



PP 2/19/19 11:16pm



GOVERNMENT
EXHIBIT
33
16 Cr. 408 (CS)

PP 2/19/18 116pm



3502-Y

BK

JM
SA

Meeting March 4/16

- GM gave VB gun in '07 to have her keep it at Ellwood after Nicci's birthday party
- Night of robbery Mark E VB went to apt & celebrated together (beer, sex, etc)

3502-BB

JM BK SA

Meeting w/ Marce 4/23/18

- First time GM just told Jahan that he robbed the bank
- Second time, a few days later GM told Jahan that VB was involved
- There was a room with no files
- Remember he made w/ GM
- Told GM about more than 20 other criminals

Shannon Becker
Samuel Adelsberg
Jamie Bagliebter
Jay McMahon

Meeting w/ Johan

4/19/18

Glo would take care of VB's son
the sons were close

Photo strip #1 → Mante, VB, Adnan, Mante's Son

#2 → VB + Mante

#3 → VB, Adnan, Nathaniel

First talk w/ Glo → bank robbery, Johan pulling it out

Later told me VB worked at Bank

put it together and asked

↳ probably w/in a month

Knew he was into crm activity but surprised he did this

knew Jeffrey + SO

Found out about VB couple months later

2nd mtg → who else was involved

3508-D

J.M. 4-19-18

9:07 AM



Search

Edit



Giovanny Marte



message



call



WhatsApp



pay

mobile

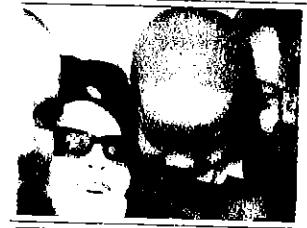
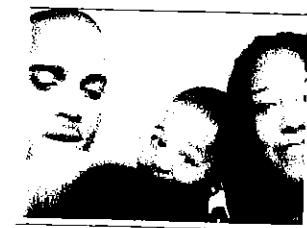
(347) 734-6780

Send Message

Share Contact

Add to Favorites

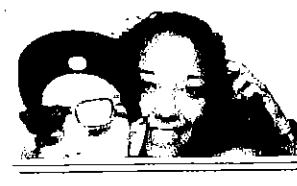
①



②



③



91A-NY-3502105 Serial 65

FD-302 (Rev. 5-8-10)

- 1 of 2 -

FEDERAL BUREAU OF INVESTIGATION

OFFICIAL RECORD

Date of entry 02/11/2016

On February 4, 2016, Special Agent Kenney, TFO Brian Menton and TFO James Menton were present at Transit District 3 in Manhattan to meet with [REDACTED]

[REDACTED] After being advised of the identities of those present and the nature of the interview, [REDACTED] provided the following information:

[REDACTED] JEFFERY MARTINEZ in Manhattan.

MARTINEZ has had conversations with [REDACTED] regarding MARTINEZ' involvement with firearms. On one occasion, MARTINEZ brought a firearm [REDACTED] [REDACTED]. MARTINEZ has also offered to sell firearms to [REDACTED]. MARTINEZ identified one seller of firearms as 50 (known to the FBI as ANDRES CRUZ). Another dealer was from White Plains, New York and a third dealer was from Brooklyn. [REDACTED] from MARTINEZ to date.

MARTINEZ told [REDACTED] that MARTINEZ has committed robberies of drug stash houses and asked [REDACTED] if [REDACTED] knew the location of any drug stash houses.

MARTINEZ also told [REDACTED] was involved in a robbery of a Wells Fargo Bank in Yonkers, New York. MARTINEZ said 50 served as the driver for the robbery but did not identify anyone else involved. MARTINEZ said they had been watching the bank and were timing the robbery with an armored car delivery. MARTINEZ said they missed the delivery by a day and did not get as much as they expected. MARTINEZ said they had guns. MARTINEZ said he personally received \$100,000 from the robbery.

MARTINEZ told [REDACTED] that there was a video on YouTube of the robbery. MARTINEZ said he did not want to look up the video on MARTINEZ' phone in case the authorities were tracking who viewed the video. MARTINEZ directed [REDACTED] where and how to view the video. [REDACTED] then viewed the video and subsequently spoke to MARTINEZ after viewing the video. MARTINEZ told [REDACTED] that MARTINEZ was the first robber to enter the bank.

[REDACTED] has represented to MARTINEZ that [REDACTED] may be interested in committing a robbery of a bank or check cashing location. MARTINEZ

Investigation on 02/04/2016 at New York, New York; United States (In Person)

File # 91A-NY-3502105

Date drafted 02/11/2016

by KENNEY BRENDAN M, MENTON BRIAN PATRICK

FD-302a (Rev. 05-08-10)

91A-NY-3502105 Serial 65

91A-NY-3502105

Continuation of FD-302 of Interview of NYPD CI [REDACTED], On 02/04/2016, Page 2 of 2

suggested that [REDACTED] rob the same bank branch because it was easy. MARTINEZ offered to accompany [REDACTED] to the Wells Fargo Bank in Yonkers, New York to show [REDACTED] how to successfully rob the bank.

3503-JJJ

Brian Merton
Jamie Baghebster
Perry Carbone
Karma Smith
Jeffrey Martinez

Sam Adelberg

Martinez Prep

7/5/18

* Gio said that one time someone did a robbery of the bank w/ the note

See DO 3898 Rowy

US Department of Justice

US Marshals Service- Southern District of New York

Personal History of Defendant

Form USM-312

Taken into Federal custody by the following:		Street Arrest (including arrest from LE office or court system) <input checked="" type="checkbox"/> Safekeeper: MCC <input type="checkbox"/> MDC <input type="checkbox"/> Provide number to right Obtained from a correctional/ detention facility: <input type="checkbox"/> Provide writ, discharge papers, prisoner receipt, medical summary Writ/ federal writ used: N <input type="checkbox"/> Y <input type="checkbox"/> Provide writ Prior federal arrest: N <input type="checkbox"/> Y <input type="checkbox"/> Provide number above					
Last Name	MARTINEZ			First Name	JEFFREY	Middle Name	
Sex	M <input checked="" type="checkbox"/> F <input type="checkbox"/> Transgender <input type="checkbox"/>	Race	W-White/ White Hispanic <input type="checkbox"/> I-American Indian/ Alaskan <input type="checkbox"/>	B-Black/ Black Hispanic <input type="checkbox"/> U-Unknown <input type="checkbox"/>	A-Asian/ Pacific Islander <input type="checkbox"/>		
Hair	BLACK	Eyes	BROWN	Height	6'1"	Weight	210
City of birth	NY	State/ Country of birth		NY		Citizenship	USPER
FBI #		State ID #		Alien #		SSN	057-78-2234
Resident address City, ST, Zip code							
Home phone	212-304-8683			Cell phone	347-822-3543		Marital status
Agency	ABCI	Place/ facility of arrest				Arrest date	03/24/14
NCIC code		Charge description	BANK ROBBERY			Title & code	18 USC 2113
NCIC code		Charge description	DISCHARGE FIREARM			Title & code	18 USC 924c
AUSA(s) assigned	ZOLKIND / SEIDEL					Court Docket #	16 MAD or CR 2018
Defendant's counsel	Federal Defenders <input type="checkbox"/> (Has defendant seen defender? Y <input type="checkbox"/> N <input type="checkbox"/>) CJA panel <input checked="" type="checkbox"/>						retained <input type="checkbox"/>
Known detainees/ warrants	N <input checked="" type="checkbox"/> Y <input type="checkbox"/> and agency:						
Long term medical conditions	N <input checked="" type="checkbox"/> Y <input type="checkbox"/> and specify:						
Psychiatric/ emotionally disturbed	N <input checked="" type="checkbox"/> Y <input type="checkbox"/> and specify:						
Injuries/ medical ailments/ post-op recovery	N <input checked="" type="checkbox"/> Y <input type="checkbox"/> and specify:						
The above conditions require:	Medical attention? Y <input type="checkbox"/> N <input type="checkbox"/> Medication? Y <input type="checkbox"/> (Is one day's dosage in agent possession? Y <input type="checkbox"/> N <input type="checkbox"/>) N <input type="checkbox"/>						
Medical clearance and fit for confinement document from healthcare professional							Y <input type="checkbox"/> N <input type="checkbox"/>
Drug addiction/ alcoholism (extreme)	N <input checked="" type="checkbox"/> Y <input type="checkbox"/> Type _____ Date/ time of last use _____ Special treatment program in use _____						

Security Cautions Select any applicable		Current or former military <input type="checkbox"/> Current or former LE/ corrections <input type="checkbox"/> Current or former intelligence <input type="checkbox"/> SAM subject or candidate <input type="checkbox"/> Assault on LE/ corrections <input type="checkbox"/>			Leadership role <input type="checkbox"/> Separation needs <input type="checkbox"/> Describe CI <input type="checkbox"/> Describe Threat to witness <input type="checkbox"/> Describe Other <input type="checkbox"/> Describe		Description, continue on Page 4 as necessary	
Alias 1		Last MARTINEZ		First, MI	JEFFERY		Remark	
Date of birth		SSN			State Driver's License			
Alias 2				First, MI	SARICA		Remark	
Date of birth		SSN			State Driver's License			
Criminal organization name(s)							Type	
Associate/ co-defendant 1		Last		First, MI			Register #	
Resident address City, ST, Zip code					Phone			
Associate/ co-defendant 2		Last		First, MI			Register #	
Resident address City, ST, Zip code					Phone			
Frequented location address, City, ST, Zip code					Phone			
Remarks								
Scar <input type="checkbox"/> Mark <input type="checkbox"/> Tattoo <input checked="" type="checkbox"/>		Location	RT AFM		Description			
Scar <input type="checkbox"/> Mark <input type="checkbox"/> Tattoo <input type="checkbox"/>		Location			Description			
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Internet source	E-mail <input type="checkbox"/> Website <input type="checkbox"/> Blog <input type="checkbox"/>	Social network <input type="checkbox"/>		Address or Site & User Name				
Internet source	E-mail <input type="checkbox"/> Website <input type="checkbox"/> Blog <input type="checkbox"/>	Social network <input type="checkbox"/>		Address or Site & User Name				
Languages		English: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Limited <input type="checkbox"/>		Other Language	No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> describe: SPANISH			
Speech characteristics		Normal <input type="checkbox"/> Accent <input type="checkbox"/> Slurred <input type="checkbox"/> Stutter <input type="checkbox"/> Other <input type="checkbox"/> describe:						

Military service	<input type="checkbox"/> Y	Country		Branch		Entry date		Discharge date	
	<input type="checkbox"/> N								
Rank			Discharge type			Military occupation			
Other number				Type			Issuing State/Country		
Other number				Type			Issuing State/Country		
Other number				Type			Issuing State/Country		
Other number				Type			Issuing State/Country		
Occupation	SECURITY GUARD				Company/employer name	GIA SECURITY			
Employment address City, ST, Zip code		136 W 187 ST NY NY			Phone number				
Start date	2014	End date	PRESENT	Point of contact	JOHN				
Bank name	BANK OF AMERICA	Account type	<input checked="" type="checkbox"/> Check	<input type="checkbox"/> Loan	Account number				
Branch address	DICKMAN BROADWAY								
Bank name		Account type	<input type="checkbox"/> Check	<input type="checkbox"/> Loan	Account number				
Branch address									
1: Relative name (Last, First, MI)					Relation	Mother		Date of birth	
Resident address City, ST, Zip code					Available phone numbers (note type)				
2: Relative name (Last, First, MI)					Relation	Grandmother		Date of birth	
Resident address City, ST, Zip code					Available phone numbers (note type)				
3: Relative name (Last, First, MI)					Relation	Sister		Date of birth	
Resident address City, ST, Zip code					Available phone numbers (note type)				
4: Relative name (Last, First, MI)					Relation	Step Brother		Date of birth	
Resident address City, ST, Zip code					Available phone numbers (note type)				
5: Relative name (Last, First, MI)					Relation			Date of birth	
Resident address City, ST, Zip code					Available phone numbers (note type)				
Specialized skill/ knowledge					Source & remarks				

Vehicle year		Make			Model		Color(s)	
Vehicle style			State and plate #				Registration date	
VIN								
Vehicle year		Make			Model		Color(s)	
Vehicle style			State and plate #				Registration date	
VIN								
Prior Arrest	Federal <input type="checkbox"/> State <input checked="" type="checkbox"/>	Agency	NYO	Date	3/3/15	Charge	CPW Y	Rap sheet attached <input type="checkbox"/>
Prior Arrest	Federal <input type="checkbox"/> State <input checked="" type="checkbox"/>	Agency	NYO	Date	3/1/10	Charge	TOS	Rap sheet attached <input type="checkbox"/>
Prior Arrest	Federal <input type="checkbox"/> State <input checked="" type="checkbox"/>	Agency	NYPD	Date	4/3/10	Charge	Burglary	Rap sheet attached <input type="checkbox"/>
Additional Information/ Remarks/ Continuation								
NOTICE TO ARRESTING AGENTS: The USMS provides the COURTESY of holding and producing the arrestee prior to their Magistrate Court appearance. The arrestee is not a USMS prisoner until the US Magistrate Judge REMANDS them to USMS custody. The arresting agent is the responsible party and must be available at all times to respond to all matters concerning their arrestee. Meals are not provided to new arrestees and are the responsibility of the arresting agent to provide.								
ARRESTEE PROCESSING CHECKLIST- For arresting agent and USMS personnel use								
USMS 312, prepared as completely as possible			USM-552 Prisoner Medical Records Release Form					
Arrestee photo			Medical clearance and fit for confinement document from healthcare professional, if necessary					
2 fingerprint cards			Strip search of arrestee					
BOP 9			Removal of property from arrestee					
WHCAP/ T or federal writ, if applicable			USM-18 reflecting No or any Property (USMS use only)					
Correctional facility discharge papers, if applicable			Copy of one or any combination of arrest warrant, complaint, or indictment (not necessary on writ)					
Correctional facility prisoner receipt, if applicable								
Correctional facility medical summary, if applicable								
Prepared by:	Name/ agency				Cell phone			Date
Reviewed by:	Name						Date	

United States Marshals Service (USMS)
PRISONER MEDICAL RECORDS RELEASE FORM

INSTRUCTIONS: Section I is to be completed by the USMS Intake Officer. Sections II & III are to be completed by the prisoner. Section II may be completed by the USMS Intake Officer if the prisoner is unable or unwilling, but Section III must be signed by the prisoner. If prisoner refuses to sign, note that in the signature block. All refusals should be immediately reported to the Office of Interagency Medical Services, Prisoner Services Division. The completed USM form 552 is to be retained in the prisoner's files.

Section I - USMS Prisoner Information

1. Prisoner Name (Last, First, MI)	2. USMS Prisoner Registration Number:	
MARTINEZ, JEFFREY		
3. District Name:	4. District #	5. Custody Date (Mo/Day/Yr)
EASTERN DISTRICT NEW YORK SOUTHERN	054	3/29/16

Section II - Prisoner Personal Data And Medical Information

6. Date Of Birth (Mo/Day/Yr)	7. Social Security No. XXXXXXXXXX	
05/02/1990		
8. Medical Insurance Information		
A) Insurance Company Name	B) Policy Number	C) Medicare /Medicaid Coverage?
UNITED HEALTHCARE		<input type="checkbox"/> Yes <input type="checkbox"/> No
9. Name Of Your Physician	10. Phone Number	
DR CHAVEZ	()	

Section III - Medical Consent And Records Release

I certify that the information I have provided above is true to the best of my knowledge.

I hereby authorize the United States Marshals Service to request, review, and have access to all medical records of care provided to me during the time that I am in the custody of that agency, and to all other medical records deemed necessary for the purposes of providing me with appropriate medical care, adjudicating medical bills for health care services provided to me while in the custody of the United States Marshals Service, and for infectious disease clearances.

Signature of Prisoner	Date
Jeffrey Martinez	
Signature of USMS Intake Officer	Date

Original-Prisoner File
 Copy to District File
 Copy Upon Transfer

Form USM-552
 Est. 6/98
 Automated 08/03

3503-V

FD-302a (Rev. 05-08-10)

91A-NY-3502105

Continuation of FD-302 of (U) JEFFREY MARTINEZ

, On 04/08/2016 Page 4 of 5

MARTINEZ returned both guns that were used in the robbery. He gave the 9mm back to his cousin FERNANDEZ with \$500 for letting him use it. He also gave the revolver back to METRA, but found out later that it was sold.

MARTINEZ saw TROUBLE a few days after the robbery. TROUBLE said he got paid between \$6,000 and \$8,000. MARTINEZ told TROUBLE how much he got paid and TROUBLE said he was going to ask GIO for more money. Sometime later, MARTINEZ talked to GIO and told him what TROUBLE said. GIO said he would pay TROUBLE more money.

After the robbery, TITO was arrested for a parole violation. TITO told MARTINEZ that he heard that GIO got \$700,000 from the bank robbery and took a trip to Dubai. He also said that GIO "broke" the girl who was the person inside the bank. Even though TITO didn't participate in the robbery he still wanted a cut of the "take." MARTINEZ asked GIO about the trip. GIO asked how MARTINEZ found out about the trip.

MARTINEZ spent his cut of the money on girls and partying. CRUZ spent his money on drugs, friends and jewelry. GIO took a trip and opened a beauty salon. The salon is closed now but was located near 207th Street and Sherman Avenue. GIO bought it for his girlfriend. His cousin, JOEL LNU, also worked there. GIO also sold the Nissan to his sister or another family member. He currently drives a black Town Car and/or a Gray Nissan SUV.

After MARTINEZ was arrested by the FBI he was shown several photographs. At the time he had no information about the female shown in photograph number 2 (**VIRGINIA BLANCO**). MARTINEZ now recognizes her as a friend of GIO's. He has seen GIO babysitting #2's son and he has seen #2 with her son. He has never seen them together but believes that they were in some kind of intimate relationship. The boy's father's name is FNU LNU, a.k.a. "Smiley." GIO and SMILEY don't get along. MARTINEZ cannot remember her name but she knows his name and will greet him when they meet in the street.

GIO told MARTINEZ that the police arrested someone for the bank robbery.



MARTINEZ was discussing a drug dealer robbery with an individual who turned out to be an FBI informant. MARTINEZ told GIO about the robbery and

3503-DDD

UNCLASSIFIED

FD-1023	FEDERAL BUREAU OF INVESTIGATION CHS REPORTING DOCUMENT	OFFICIAL RECORD
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HEADER

Source ID: [REDACTED]
 Date: 03/28/2016
 Case Agent Name: KENNEY, BRENDAN
 Field Office/Division: New York
 Squad: C26

SOURCE REPORTING

Date of Contact: 03/18/2016

List all present including yourself (do not include the CHS):
 TFO James Menton

Type of Contact: Telephonic

Date of Report: 03/28/2016

Substantive Case File Number

91A-NY-3502105

Check here if additional reporting is in Echo
 No

Source Reporting:

On 03/18/2016, CHS reported the following to TFO James Menton:

JEFFERY MARTINEZ told CHS that MARTINEZ committed a home invasion robbery on the evening of March 20, 2016 in New Jersey. MARTINEZ stole the money that was owed to him and additional money.

The victim's brother is now looking for MARTINEZ to exact revenge.

SIGNATURE

Submitted By	BKENNEY (Brendan Kenney)	Thu, 31 Mar 2016 15:33:13 -0400
First Level Approved By	dpmckenna (DANIEL MCKENNA)	Thu, 31 Mar 2016 16:28:54 -0400

FD-1023	Page 1 of 1	FEDERAL BUREAU OF INVESTIGATION
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UNCLASSIFIED

BLANCO - 003890

1 of 1

91A-NY-3502105 Serial 139

FD-302 (Rev. 5-8-10)

- 1 of 5 -

OFFICIAL RECORD

FEDERAL BUREAU OF INVESTIGATION

Date of entry 06/20/2016

On June 15, 2016, ANDRES CRUZ was interviewed pursuant to a proffer agreement at the United States Attorney's Office for the Southern District of New York in White Plains, New York. CRUZ was accompanied by his attorney, CALVIN GARBER. The following law enforcement personnel participated in the interview: AUSA Douglas Zolkind and Special Agents John Sullivan and Brendan Kenney. Prior to the interview, AUSA Zolkind explained the terms of the proffer agreement to CRUZ. After reviewing and executing the proffer agreement with his attorney, CRUZ provided the following information:

On the day before the bank robbery, CRUZ received a telephone call from JEFFREY MARTINEZ. MARTINEZ asked CRUZ where he was located and arranged to meet CRUZ. CRUZ then met GIO (known to the FBI as GIOVANNY MARTE) and MARTINEZ on the street in Washington Heights. MARTE and MARTINEZ were in a Nissan, the same car that was used during the robbery the following day, and asked CRUZ to get in the car. MARTE was driving the car. MARTE and MARTINEZ told CRUZ they wanted CRUZ to drive for a bank robbery. MARTE and MARTINEZ said they had another person who was supposed to act as the driver but that person backed out. MARTE said he had been planning the robbery and scouting the bank for approximately a year and MARTINEZ had been involved in the planning for the previous six months. MARTE said the bank had been robbed before because it was close to the highway and close to the border of the city where the bank is located so they just had to get out of that city. MARTE said he had looked for cameras in the area. MARTE said CRUZ would get at least \$20,000 to act as the driver. MARTE said he knew the robbery would be successful because MARTE knew a female employee on the inside of the bank.

At this point in the interview, CRUZ advised he was not truthful during his post-arrest interview and recognized SMILEY's girlfriend from one of the photographs shown to CRUZ. CRUZ told the interviewing agents he did not recognize the photograph of SMILEY's girlfriend when he in fact knew the female as SMILEY's girlfriend.

During the meeting with MARTE and MARTINEZ the day before the robbery, CRUZ agreed to act as the driver. MARTE and MARTINEZ told CRUZ that a third person would also be going into the bank with MARTE and MARTINEZ.

Investigation on 06/14/2016 at White Plains, New York, United States (In Person)

File # 91A-NY-3502105

Date drafted 06/15/2016

by KENNEY BRENDAN M, SULLIVAN JOHN D

91A-NY-3502105 Serial 139

FD-302a (Rev. 05-08-10)

91A-NY-3502105

Continuation of FD-302 of (U) 06/15/2016 Proffer of ANDRES CRUZ , On 06/14/2016 , Page 2 of 5

MARTE and CRUZ exchanged telephone numbers and MARTE said he would call CRUZ tomorrow. MARTE and MARTINEZ dropped CRUZ off.

The next day, MARTE called CRUZ and told CRUZ to come down to the street. MARTE and MARTINEZ were in the Nissan. CRUZ entered the car and MARTE went over the plan. MARTE and MARTINEZ told CRUZ they would each have guns. MARTINEZ and the fourth person were supposed to take care of the guard and lock both doors while MARTE stole the money. MARTE and MARTINEZ did not show the guns to CRUZ but CRUZ knew it would not be hard for them to get guns. MARTE was calling the fourth person who was supposed to participate in the robbery but could not reach the person. After failing to reach the fourth person, MARTE and MARTINEZ dropped CRUZ off and decided to call off the robbery because the plan required three robbers to enter the bank so both doors could be locked while MARTE stole the money.

Approximately an hour after CRUZ was dropped off, MARTE called CRUZ and said he had found a different person to act as the fourth person. MARTE told CRUZ to meet MARTE and MARTINEZ. CRUZ met MARTE and MARTINEZ in the Nissan and entered the driver's seat. The fourth person (known to the FBI as ROWY VAZQUEZ) then entered the car. CRUZ had seen VAZQUEZ around before but did not know him. MARTE was in the front passenger's seat and VAZQUEZ and MARTINEZ were in the back seat.

MARTE told VAZQUEZ that MARTE and MARTINEZ had guns. VAZQUEZ also wanted a gun. MARTINEZ tried calling people to obtain a gun for VAZQUEZ but was unable to locate a gun so they traveled to the hardware store on Dyckman Avenue. Someone from the vehicle, CRUZ is unsure which person, went into the hardware store and bought a saw. After the saw was purchased, MARTE explained the plan to VAZQUEZ. MARTE told VAZQUEZ to close the doors, get everyone on the floor and make sure no one left the bank. MARTE told VAZQUEZ that CRUZ would be paid at least \$20,000 and VAZQUEZ would get paid at least \$30,000 or \$35,000. MARTE and MARTINEZ did not say how much they would each get paid. MARTE said he knew from the person on the inside that they were going to get a lot of money so those amount were the least they would be paid. The person on the inside was supposed to be off on the day of the robbery.

MARTE directed CRUZ where to drive. After getting to the bank, MARTE told CRUZ to drive up the road past the bank and make a u-turn and drive down past the bank again. MARTE then directed CRUZ to make another u-turn and go up past the bank, make another u-turn and come down to the bank where MARTE, VAZQUEZ and MARTINEZ exited the vehicle. CRUZ then made a u-turn and waited up the hill from the bank.

During the robbery, CRUZ and MARTE were talking through earpieces over the phone. CRUZ could hear commotion over the call and people being told

91A-NY-3502105

Continuation of FD-302 of (U) 06/15/2016 Proffer of ANDRES CRUZ , On 06/14/2016 , Page 3 of 5

to get down. CRUZ could hear MARTE telling a person to open it. CRUZ could hear someone telling MARTE they did not have the combination and CRUZ then heard a gunshot. CRUZ was telling MARTE to forget it and leave. CRUZ then heard a woman telling MARTE to relax and the person opening the vault was nervous. CRUZ then heard a second gunshot. CRUZ heard MARTE say the person did have the combination and told CRUZ to relax. MARTE then told CRUZ to come down and CRUZ pulled the car outside the bank.

CRUZ then saw MARTE, VAZQUEZ and MARTINEZ struggling with the door. MARTE, VAZQUEZ and MARTINEZ then exited the bank and entered the car. CRUZ drove away but missed the turn. MARTE told CRUZ he missed the turn so CRUZ put the car in reverse and made the turn. CRUZ then encountered traffic. Police cars were heading towards the bank. MARTE said the police were looking for 3 or 4 people so he told VAZQUEZ and MARTINEZ to get down. After the police cars passed, CRUZ entered the opposing lane of traffic and ran a red light before entering the highway. CRUZ saw police cars on the highway. MARTE told CRUZ to drive faster and CRUZ and MARTE began arguing about CRUZ' driving.

CRUZ drove to a parking garage in the Bronx. MARTE stayed in the car and MARTINEZ, CRUZ and VAZQUEZ exited the car. MARTE gave money for a cab to MARTINEZ, CRUZ and VAZQUEZ out of the string bookbag that contained the robbery proceeds. MARTE then drove off. MARTINEZ, CRUZ and VAZQUEZ walked to find a cab. After finding a cab, MARTINEZ, CRUZ and VAZQUEZ took a cab to Dyckman Avenue before splitting up.

Later that evening, CRUZ met up with MARTINEZ and went to the house of a friend, LUIS JUAREZ and DAVID. CRUZ then left and went to the house of another friend, DIANA.

Approximately six hours after the robbery, CRUZ met with MARTE and MARTINEZ in a park. CRUZ expressed worry that the bills stolen during the robbery may have been marked. MARTE and MARTINEZ said CRUZ did not have to worry about marked bills because the person on the inside was SMILEY's girlfriend. MARTE confirmed the person on the inside was SMILEY's girlfriend by nodding.

Later that night, MARTINEZ called and told CRUZ he was going to meet MARTE to pick up money. CRUZ asked MARTINEZ to pick up CRUZ' money and MARTINEZ agreed. Later, MARTINEZ called CRUZ and told CRUZ he had CRUZ' money. CRUZ and MARTINEZ then met on Dyckman Avenue and MARTINEZ gave CRUZ a bag with \$10,000. MARTINEZ did not tell CRUZ what MARTINEZ was paid.

A day or two after the robbery, CRUZ ran into VAZQUEZ. VAZQUEZ asked CRUZ if CRUZ had spoken to MARTE or MARTINEZ because VAZQUEZ was only paid \$5,000. CRUZ provided VAZQUEZ with MARTE's telephone number but MARTE had

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Continuation of FD-302 of (U) 06/15/2016 Proffer of ANDRES CRUZ , On 06/14/2016 , Page 4 of 5

already changed his phone number. In later conversations with VAZQUEZ, VAZQUEZ told CRUZ he was looking to break into MARTE's apartment and tie up MARTE to get more money but CRUZ said he was not interested.

CRUZ never asked MARTE for more money.

After the robbery, MARTE bought a sports utility vehicle and a nail salon on Sherman Avenue and 207th Street.

CRUZ was then showed a series of photographs and provided the following information:

Photo # 9 - CRUZ did not recognize the individual

Photo # 12 - CRUZ did not recognize the individual

Photo # 13 - CRUZ did not recognize the individual

Photo # 2 - CRUZ identified the individual as SMILEY's girlfriend. (known to the FBI as VIRGINIA BLANCO)

Photo # 7 - CRUZ did not recognize the individual

Approximately one to three days after the robbery, MARTINEZ brought the revolver used in the bank robbery to CRUZ' house. MARTINEZ said he was scared to keep the gun at MARTINEZ' house in case he was identified because MARTINEZ, unlike CRUZ, had entered the bank during the robbery. CRUZ kept the gun for a few days then MARTINEZ took the gun back and said he was going to sell the gun. MARTINEZ later told CRUZ he sold the gun in Brooklyn. MARTINEZ never said anything to CRUZ about the second gun used in the robbery.

MARTINEZ told CRUZ he never counted his take of the money so he does not know what he was paid, but CRUZ thought he was lying.

Approximately two years before the bank robbery, MARTE asked CRUZ to travel to the Dominican Republic, swallow drugs and transport the drugs back to the United States. MARTE told CRUZ that MARTE's people would pay for the tickets. MARTE said people had transported drugs for MARTE in the past and they had people in the airport to help CRUZ make sure he was successful. MARTE told CRUZ he would be paid \$5,000 and CRUZ agreed. MARTE took a picture of CRUZ and told CRUZ the picture would be given to people working at the airport that would look out for CRUZ.

CRUZ traveled to the Dominican Republic and stayed with EVANDER LNU. CRUZ was supposed to swallow 50 containers of cocaine but became ill after ingesting 10. CRUZ then passed the 10 containers of cocaine in the

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91A-NY-3502105 Serial 139

91A-NY-3502105

Continuation of FD-302 of (U) 06/15/2016 Proffer of ANDRES CRUZ, On 06/14/2016, Page 5 of 5

Dominican Republic before traveling. CRUZ traveled back to the United States but was stopped by federal agents. CRUZ was questioned and lied to the agents by stating he was in the Dominican Republic for his aunt's funeral. After the federal agents called CRUZ' mother, who did not corroborate CRUZ' story, CRUZ was x-rayed. After no drugs were found in CRUZ' body, CRUZ was released.

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FD-302 (Rev. 5-8-10)

- 1 of 3 -

OFFICIAL RECORD

FEDERAL BUREAU OF INVESTIGATION

Date of entry 08/24/2016

On July 1, 2016, ANDRES CRUZ was interviewed pursuant to a proffer agreement at the United States Attorney's Office for the Southern District of New York in White Plains, New York. CRUZ was accompanied by his attorney, CALVIN GARBER. The following law enforcement personnel participated in the interview: AUSA Douglas Zolkind and Special Agent John Sullivan. After being advised of the identities of the government attorney, the interviewing Agent and the nature of the interview CRUZ provided the following:

Before CRUZ met with GIO (**GIOVANNI MARTE**) and JEFFREY MARTINEZ (MARTINEZ) together, CRUZ met MARTINEZ near the projects down the block to smoke some marijuana. MARTINEZ told him that he and GIO went to a bank that had been robbed before and that it was close to the highway.

At a different meeting, CRUZ expressed his concern that the money they were taking from the bank would have "marked bills" or dye packs. GIO explained that the money that they were going to take was the money that the customers gave to the bank so it wouldn't have any "marked bills" or dye packs.

When GIO was explaining what everyone's job was during the robbery he told JEFFREY MARTINEZ to "take the guard down."

As they were pulling up to the bank, just before they went inside, MARTINEZ, GIO and the little guy (**ROWY VASQUEZ**) put on gloves. CRUZ did not wear gloves.

When MARTINEZ, GIO and the little guy were exiting the bank, CRUZ almost drove away before GIO was able to get in the car. CRUZ stopped, let GIO and then drove away.

After the robbery, that same day, CRUZ threw away the clothes that he wore. He threw them away down the street from where he lived. MARTINEZ told CRUZ that he also threw away the clothes he wore during the robbery.

When GIO met MARTINEZ and CRUZ in the park after the robbery he gave them both \$1,000. He said he left the rest of the money in the car which

Investigation on 07/01/2016 at White Plains, New York, United States (In Person)

File # 91A-NY-3502105 Date drafted 07/21/2016

by SULLIVAN JOHN D

91A-NY-3502105

Continuation of FD-302 of (U) 07/01/2016 Proffer of ANDRES CRUZ , on 07/01/2016 , Page 2 of 3

was parked and that he would give them the rest of their share later. At the park GIO told them that inside the bank, during the robbery, he fired one shot in the air and a second one near a guy's leg because the guy said he didn't know the combination. GIO knew the employee knew the combination because the information that he had previously gotten from the employee who worked there, the "inside person."

During CRUZ' last court appearance, DAVID JUAREZ (DAVID) was in the back of the court room. DAVID knows CRUZ and MARTINEZ. DAVID owes MARTINEZ money, approximately \$1,000, from a past deal. MARTINEZ ended up in jail before DAVID was able to repay him. DAVID thought that MARTINEZ was going to shoot him over the money. DAVID sells weed to make money. He got stopped in his car by the cops with weed. The cops impounded the car. He borrowed the money from MARTINEZ to get the car out of the impound lot so he could continue to sell weed.

CRUZ came back to the New York area around April 16, 2016, to fix his taxes. DAVID and his brother LUIS JUAREZ (LUIS) knew that MARTINEZ had been arrested.

When CRUZ was in West Virginia he got a call from DAVID. DAVID was scared. He told CRUZ that he was worried that MARTINEZ might think that he "ratted" him out and that's why MARTINEZ was arrested.

CRUZ called DAVID after he was arrested. DAVID wanted to make sure that CRUZ knew he didn't "rat" him out. CRUZ talked to DAVID about doing the Wells Fargo robbery. CRUZ may have told DAVID that GIO forced him to do the robbery. CRUZ also talked about the robbery with DAVID when he lived in Ohio.

LUIS and his cousin bought a house in Los Angeles. Each of them owned 1/2 of the house. The were going to open up a hat store.

DAVID had received a lump sum of money at age 18 from a lawsuit that he won from an accident.

DAVID and LUIS knew about the bank robbery before it happened. MARTINEZ, CRUZ, DAVID and LUIS used to get together. When they did they talked about the robbery. They also talked about it after the robbery. They discussed the facts that CRUZ drove, that an employee of the bank didn't want to open the safe, that GIO fired two shots inside the bank. They also discussed the fact that sometime after the robbery, MARTINEZ gave CRUZ a revolver to hold at his house. MARTINEZ didn't want to be caught with it and believed, that since CRUZ didn't go inside the bank, it would be safer with him.

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91A-NY-3502105 Serial 148

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Continuation of FD-302 of (U) 07/01/2016 Proffer of ANDRES CRUZ, on 07/01/2016, Page 3 of 3

CRUZ gave some of the \$1,000 he received from GIO in the park to DAVID and LUIS. DAVID got approximately \$500 and LUIS got approximately \$200. CRUZ also gave some of his share of the robbery money to his girlfriend so she could fix a tattoo. He also spent money on clothes.

Regarding a previous proffer, CRUZ does not remember GIO nodding when discussing SMILEY's girlfriend being the bank employee who was providing information. CRUZ and MARTINEZ had a conversation shortly after the robbery where they talked about the person inside of the bank being SMILEY's girlfriend.

LOUIS was the individual who bought the plane ticket for CRUZ when he had previously flown to the Dominican Republic.

Tom Marella
Brian Menden
Jay McMahon
Sam Adelsberg
Jamie Bagleyter

Meeting w/ CMZ

4/3

Aware Blanco was arrested

Gio & Jeffrey approached me in car to discuss robbery. They were in car together

Gio scouting the place for a year he said; Martinez said planning for 6 months

917 658-7315 - Cruz's phone number during that time
stable phone

They were going after \$ in a specific place. I asked about ~~the~~
marked bills but they said not to worry about that because they had someone on the inside

On the call heard

- Gio getting annoyed at guy
- telling to open vault
- telling can't get it
- the shots fired
- a woman saying don't hurt him

Told in advance id get \$20, I got \$20

Vasquez didn't get the amt he expected

Jeff told me that Gio dropped her phone

Stuck around after shots fired because he was loyal to Jeffrey

Virginia mother of Smiley's kid (Laposa) - Yaniris
don't remember meeting her

Found out VB was insider by Jeffrey after robbery, probably couple days
Then I felt better about spending the \$, it was a bunch of \$10
said it was customer's \$ that was being deposited that day
\$ - some looked new, some looked a little worn
all the \$ was in \$10 bills

gave friends mom \$1k they were going to get kicked out

Moved to Ohio 2014

Came back to NY, heard Martinez arrested & house was raided so
Went back to Ohio.

Never saw VB & GM together

Think Gio lived in the Bronx at time of robbery, not sure

Gio called day of in the morning

& then called again later after Vasquez found
Jeffrey's # should be on phone, don't know about Gio

↳ probably just a G



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*300 Quarropas Street
White Plains, New York 10601*

April 26, 2018

BY EMAIL

Michael Burke, Esq.
Burke, Miele & Golden, LLP
40 Matthews Street, Suite 209
Goshen, New York 10924

Re: *United States v. Virginia Blanco, S4 16 Cr. 408 (CS)*

Dear Mr. Burke:

This seventh letter regarding discovery provides discovery pursuant to Rule 16(a) of the Federal Rules of Criminal Procedure and seeks reciprocal discovery. It supplements our earlier letters regarding discovery dated September 29, 2017, October 6, 2017, January 3, 2018, April 4, 2018, April 16, 2018, and April 23, 2018.

Disclosure by the Government

In the same message as this letter, please find an attachment that contains various documents bearing control numbers BLANCO-03081 – BLANCO-03203:

- #3204 - #3251 Code of Ethics 2013
- #3252 - #3314 Protecting Wells Fargo Information 2013
- #3315 - #3345 Robbery Procedures July 2013
- #3346 - #3350 Cash Delivery Records

Please be advised that Andres Cruz made the following statements during discussions with the Government:

- That Cruz received a telephone call from Jeffrey Martinez the day before the robbery during which Martinez asked Cruz where he was located and arranged to meet Cruz. Cruz met Giovanny Marte and Martinez in Washington Heights to discuss the robbery. During that conversation, Marte said he had been planning the robbery and scouting the bank for approximately a year and Martinez had been involved in the planning for the previous six months. Cruz agreed to be the driver for the robbery during this conversation. In a later conversation with the Government, Cruz again said that Marte

Michael Burke, Esq.
April 26, 2018
Page 2 of 3

said he was scouting the place for a year and Martinez said he was planning for six months.

- The day after Cruz's conversation with Martinez and Marte, Marte called Cruz and told Cruz to come down to the street.
- In a post-arrest interview, Cruz claimed that he did not know if there was an insider at the bank. Later, Cruz noted that Marte and Martinez said the person on the inside was Smiley's girlfriend. Marte confirmed the person on the inside was Smiley's girlfriend by nodding. In a later discussion with the Government, Cruz said he did not remember Marte nodding when discussing Smiley's girlfriend being the bank employee who was providing information. Cruz and Martinez had a conversation shortly after the robbery where they talked about the person inside of the bank being Smiley's girlfriend. He said this conversation may have taken place a couple days after the robbery.
- Approximately two years before the bank robbery, Marte asked Cruz to travel to the Dominican Republic, swallow drugs and transport the drugs back to the United States.
- When Marte was explaining everyone's job during the robbery, he told Martinez to "take the guard down."

Disclosure by the Defendant

In light of your prior request for the foregoing discovery, the Government hereby requests again reciprocal discovery under Fed. R. Crim. P. 16(b). Specifically, we request that you allow inspection and copying of: (1) any books, or copies or portions thereof, and which are in the defendant's possession, custody or control, and which the defendant intends to introduce as evidence or otherwise rely on at trial; and (2) any results or reports of physical or mental examinations and of scientific tests or experiments made in connection with this case, or copies thereof, which are in the defendant's possession or control, and which the defendant intends to introduce as evidence or otherwise rely on at trial or which were prepared by a witness whom the defendant intends to call at trial.

Michael Burke, Esq.
April 26, 2018
Page 3 of 3

The Government also requests that the defendant disclose prior statements of the witnesses she will call to testify. *See* Fed. R. Crim. P. 26.2; *United States v. Nobles*, 422 U.S. 225 (1975). We request that such material be provided on the same basis upon which we agree to supply the defendants with 3500 material relating to Government witnesses.

Very truly yours,

GEOFFREY S. BERMAN
United States Attorney

By: Jamie Baglebter
Samuel Adelsberg
Jamie Baglebter
James McMahon
Assistant United States Attorneys
(914) 993-1936

3502-PP

JB MF
SA JM

Wkt prep w/ Mate 6/29

- VB knew that I was dealing drug since 69
- kept drugs and gun in her apt. on Ellwood
- * GM was partner w/ Smiley → Smiley would give him Marijuana and Ecstasy pills on consignment
- GM & Smiley → dealing together until early 2011
- committed a shoot out w/ Smiley b/c they broke his car window
- Smiley & VB lived together for part of the time b/wn 08-11
- * Fight w/ Smiley about drugs - 2011
 - Smiley wasn't being consistent
 - First fight over a spot → Ellwood & 196
 - Smiley lost
 - GM & Smiley owned the spot → 3 8 hr shifts
 - lookouts & pitchers & managers worked for GM
 - Only spot that GM had
 - VB told GM that spot was taken by taking Smiley's spot + I can't feed my son
 - Only sold weed at spot → only had 3 "employees" for weed sales
 - VB would ~~sell~~ give drugs to Smiley's customers after Smiley was busy
 - ~~GM~~ Smiley kept lbs of weed in VB's house
 - GM had only ounces
 - Wouldn't go to VB's house alone
 - Drug customers would give VB \$ & VB would give drugs
 - Never really spoke w/ Smiley after fight
 - * Spot got raided so they shut it down
 - After return to DR got back into drug selling but didn't really communicate w/ Smiley again
 - Summary: VB held drugs for Smiley & GM and met customers on Smiley's behalf
 - VB also brought them customers sometimes
 - Sometimes he's with VB & Smiley calls to tell her to meet w/ customers
 - GM & Smiley would give her \$ for holding & helping w/ the drugs → few \$100 dollars

3502-PP

-Raja De

- marijuana, pills, & coke
- would keep drugs in Tito's apt or Details
- Orgs in safe box
- Felix-Pete → VB's father + Felix mother were sibs:
 - VB's cousin - lives on 3rd fl in Ellwood
 - GM knew he was selling pills
 - GM first bought pills from him during summer
 - GM was buying thousands of pills/month from September 2012 - 2016
 - cost from \$5-10 a pill (perceut)
 - ~~GM~~ Felix would communicate w/ ~~VB~~ GM ~~then~~
VB → They would deal in front of her 0/1-2/week
 - Felix would give her pills to give to GM
 - more than 20 times → Sept 2012 - Spring 2013
 - prices went up and they stopped dealing w/ him
 - About half the times GM would give ~~VB~~ \$ to give ~~back~~ to Felix
 - 2-3/week transactions between GM & Felix

Na+

- probably
- didn't ~~use~~ to be in the neighbourhood when selling drugs
-

vers le 11

- Lived in 40 Ellwood
- 2009-2013 / 2014
- buying m3or 9 parcels
- partners w/ GM → GM would sue cash
- Sept 2012 - Spotted ~~GM~~ 2013
- ~~GM~~ gave drugs to VB to sue to GM
- 5x of GM gave cash to VB to sue to ~~GM~~
- Viewed 12/12

JB, Transect in front of her \rightarrow Once every 2 weeks
Friends of Venketh

Shiley → purchased from him since at least 2006
→ late 2009 → share short

3502-PP

- Grew up in the same neighbourhood
- knew her aches began
for possessed
- She was living w/
- the apt. → ^{more or less} ^{disturbance} ^{spot}
- smile
- Smiley →

91A-NY-3502105 Serial 65

- 1 of 2 -

FD-302 (Rev. 5-8-10)

OFFICIAL RECORD

FEDERAL BUREAU OF INVESTIGATION

Date of entry 02/11/2016

On February 4, 2016, Special Agent Kenney, TFO Brian Menton and TFO James Menton were present at Transit District 3 in Manhattan to meet with [REDACTED]

[REDACTED] After being advised of the identities of those present and the nature of the interview, [REDACTED] provided the following information:

[REDACTED] JEFFERY MARTINEZ in Manhattan.

MARTINEZ has had conversations with [REDACTED] regarding MARTINEZ' involvement with firearms. On one occasion, MARTINEZ brought a firearm [REDACTED]. MARTINEZ has also offered to sell firearms to [REDACTED]. MARTINEZ identified one seller of firearms as 50 (known to the FBI as ANDRES CRUZ). Another dealer was from White Plains, New York and a third dealer was from Brooklyn. [REDACTED] from MARTINEZ to date.

MARTINEZ told [REDACTED] that MARTINEZ has committed robberies of drug stash houses and asked [REDACTED] if [REDACTED] knew the location of any drug stash houses.

MARTINEZ also told [REDACTED] was involved in a robbery of a Wells Fargo Bank in Yonkers, New York. MARTINEZ said 50 served as the driver for the robbery but did not identify anyone else involved. MARTINEZ said they had been watching the bank and were timing the robbery with an armored car delivery. MARTINEZ said they missed the delivery by a day and did not get as much as they expected. MARTINEZ said they had guns. MARTINEZ said he personally received \$100,000 from the robbery.

MARTINEZ told [REDACTED] that there was a video on YouTube of the robbery. MARTINEZ said he did not want to look up the video on MARTINEZ' phone in case the authorities were tracking who viewed the video. MARTINEZ directed [REDACTED] where and how to view the video. [REDACTED] then viewed the video and subsequently spoke to MARTINEZ after viewing the video. MARTINEZ told [REDACTED] that MARTINEZ was the first robber to enter the bank.

[REDACTED] has represented to MARTINEZ that [REDACTED] may be interested in committing a robbery of a bank or check cashing location. MARTINEZ

Investigation on 02/04/2016 at New York, New York, United States (In Person)

File # 91A-NY-3502105

Date drafted 02/11/2016

by KENNEY BRENDAN M, MENTON BRIAN PATRICK

91A-NY-3502105 Serial 65

FD-302a (Rev. 05-08-10)

91A-NY-3502105

Continuation of FD-302 of Interview of NYPD CI [REDACTED], On 02/04/2016, Page 2 of 2

suggested that [REDACTED] rob the same bank branch because it was easy. MARTINEZ offered to accompany [REDACTED] to the Wells Fargo Bank in Yonkers, New York to show [REDACTED] how to successfully rob the bank.

91A-NY-3502105 Serial 147

- 1 of 2 -

FD-302 (Rev. 5-8-10)

OFFICIAL RECORD

FEDERAL BUREAU OF INVESTIGATION

Date of entry 08/23/2016

On August 2, 2016, [REDACTED] was interviewed pursuant to a proffer agreement at the United States Attorney's Office for the Middle District of Florida in Orlando, Florida. [REDACTED] was accompanied by his attorneys, LAWRENCE WALTERS and WHITNEY BOAN. The following law enforcement personnel participated in the interview: AUSA Illianis Rivera, Federal Bureau of Investigation (FBI) Special Agent Bryce Essary, and Homeland Security Investigation (HSI) Special Agent Brian DiPerna. Prior to the interview, AUSA Rivera referenced the terms of a previous proffer agreement that [REDACTED] conducted. After reviewing the previous proffer agreement with his attorney, [REDACTED] provided the following information:

Approximately two months prior to the date of the interview, possibly early June 2016, VASQUEZ confided in [REDACTED] regarding a robbery that took place in New York. VASQUEZ told [REDACTED] that he and his friend, known only to [REDACTED] as GIO, robbed a Wells Fargo Bank somewhere in New York. VASQUEZ maintained a yellow folder in his jail cell, which contained paper work and a collection of photographs that appeared to be security camera footage. VASQUEZ showed [REDACTED] the photographs of two separate individuals wearing what appeared to be concealing garments over their faces with sunglasses. One of the individuals was wearing a black jacket with what appeared to be a Nike swoosh, and the other individual was wearing a lighter colored jacket, or hoodie, with an orange or red hat. VASQUEZ identified the individual wearing the black jacket with a Nike Swoosh as GIO.

VASQUEZ identified himself to [REDACTED] as the individual wearing the hat with the lighter colored jacket, or hoodie. A second photo revealed either a Toyota or Honda vehicle that was utilized as a getaway vehicle. [REDACTED] was not certain of the type of vehicle, but believed it was either an Accord or a Corolla.

VASQUEZ told [REDACTED] that GIO planned the entire robbery. VASQUEZ and GIO conducted surveillance on the bank approximately two days prior to the robbery.

VASQUEZ told [REDACTED] about another individual that was somehow involved in the robbery, SMILEY. [REDACTED] did not know what role SMILEY played in the robbery, but explained that VASQUEZ believed that SMILEY was snitching on

Investigation on 08/02/2016 at Orlando, Florida, United States (In Person)

File # 91A-NY-3502105 Date drafted 08/02/2016

by Bryce Essary

91A-NY-3502105 Serial 147

FD-302a (Rev. 05-08-10)

91A-NY-3502105

(U) 08/02/2016 Proffer Interview of ABDUAL
Continuation of FD-302 of HAMID On 08/02/2016 Page 2 of 2

the entire crew.

VASQUEZ told [REDACTED] that the crew stole approximately \$300,000 from the Wells Fargo robbery. VASQUEZ was ripped off by GIO, and did not get as much money as he was expecting for his participation in the robbery. VASQUEZ and GIO disagreed on the way that the robbery was supposed to take place. VASQUEZ did not want to use guns, and argued in favor passing a threatening note to the bank teller as opposed to the use of firearms. GIO ended up utilizing a gun during the Wells Fargo robbery, and shot the gun a few times to scare people inside of the bank.

VASQUEZ told [REDACTED] that he's not worried about the New York FBI case against him, because it's just a bank robbery. VASQUEZ explained to [REDACTED] that the FBI does not know about an additional three banks that he robbed. [REDACTED] did not ask what banks, or where they were robbed, but knew that the amounts stolen were as follows: \$130,000; \$95,000; and \$56,000..



POLICE DEPARTMENT
LEGAL BUREAU
F.O.I.L Unit, Room 110C
One Police Plaza
New York, NY 10038

Daniel Sullivan
106 Valentine Lane
Apt 1E
Yonkers, NY, 10705

November 2, 2021

FOIL Request #: FOIL-2021-056-16180
Your File #:

Dear Sir or Madam:

This is in response to your request received by this office on November 2, 2021 in which you requested access to certain records under the New York State Freedom of Information Law (FOIL).

Your request has been assigned to Chinnock (646-610-6445) of this office. Before a determination can be rendered, further review is necessary to assess the potential applicability of exemptions set forth in FOIL, and whether the records can be located. I estimate that this review will be completed, and a determination issued within 90 business days of this letter.

This is not a denial of the records you requested. Should your request be denied in whole or in part, you will then be advised in writing of the reason for any denial, and the name and address of the Records Access Appeals Officer.

Note: Due to issues caused by the COVID-19 pandemic there may be extensive delays, lasting up to one year, in determining your request.

Very truly yours,

Richard Mantellino
Lieutenant
New York City Police Department (NYPD)

Lt. Richard Mantellino
Legal Bureau – FOIL Unit
One Police Plaza, Room 110-C
New York, NY 10038

Daniel Sullivan
106 valentine Lane Apt 1E
Yonkers, Ny 10705

October 6, 2021

Dear Lt. Mantellino

Under the provisions of the New York Freedom of Information Law, Article 6 of the Public Officers Law, I hereby request a copy of records or portions thereof pertaining to Giovanni Marte D.O.B October 31, 1991 with a arrest date of January 10, 2015 and January 19,2015.

I am respectfully requesting any police reports, supplementary reports and accusatory reports that is in possession or control of the New York City Police Department, with the name Giovanni Marte D.O.B October 31, 1991 with a arrest date of January 10, 2015 and January 19,2015.

Respectfully Submitted,





POLICE DEPARTMENT
LEGAL BUREAU
F.O.I.L Unit, Room 110C
One Police Plaza
New York, NY 10038

Daniel Sullivan
106 Valentine Lane
Apt 1E
Yonkers, NY, 10705

January 11, 2022

FOIL Request #: FOIL-2021-056-16180
Your File #:

Dear Sir or Madam:

This is in response to your request received by this office on November 2, 2021 in which you requested access to certain records under the New York State Freedom of Information Law (FOIL).

I must deny access to the records you requested on the basis of Public Officers Law Section 87(2)(a). These records are sealed under court order, pursuant to Criminal Procedure Law Section 160.50 and can only be requested by the arrested person or their representative.

In order to release these records, this unit must receive a notarized affidavit from the arrested person or their representative within thirty (30) days of the date of this letter, addressed to the attention of Chinnock (646-610-6445), who has been assigned to handle your case. Failure to do so will result in this file being CLOSED.

You must notify this unit of any changes to address. Failure to do so will render this unit unable to give you the document(s) you requested.

Very truly yours,

A handwritten signature in black ink, appearing to read "LT R. Mantellino".

Richard Mantellino
Lieutenant
New York City Police Department (NYPD)



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*1 Saint Andrew's Plaza
New York, New York 10007*

June 25, 2021

BY ECF

The Honorable Kimba M. Wood
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Ivan Brea, 19-CR-821 (KMW)*

Dear Judge Wood:

The Government respectfully submits this letter in connection with the sentencing of the defendant, Ivan Brea, which is scheduled for June 30, 2021. For the reasons set forth below, the Government submits that a sentence within the stipulated Guidelines range of 100 to 125 months' imprisonment would be fair and appropriate.

A. Background

From at least January 2016 through November 2019, Ivan Brea and others were members of a drug trafficking organization that conspired to distribute crack cocaine, cocaine, Oxycodone, Percocet, and marijuana. PSR ¶ 2. Members of the conspiracy sold drugs out of a small grocery store named "Lia's Deli Grocery." PSR ¶ 16. Brea held a managerial role in the conspiracy. PSR ¶ 18. He was responsible for overseeing and re-supplying the crack that was on hand for re-sale, and he managed the shifts during which members of the conspiracy sold drugs out of the store. PSR ¶ 18. During the conspiracy, some of Brea's co-conspirators possessed firearms in furtherance of the drug trafficking organization. PSR ¶ 17.

In November 2019, a Grand Jury charged Brea and others with conspiring to distribute 280 grams and more of crack cocaine, in violation of 21 U.S.C. § 841(b)(1)(A), conspiring to distribute a detectable amount of cocaine, Oxycodone, and Percocet, in violation of § 841(b)(1)(C), and conspiring to distribute marijuana, in violation of § 841(b)(1)(D). On December 18, 2020, Brea pled guilty to a lesser included offense, conspiring to distribute a quantity of crack cocaine, in violation of § 841(b)(1)(C). Brea has acknowledged that he conspired to distribute more than 280 grams of crack. PSR ¶ 8.

Under the plea agreement, the parties stipulated that the Guidelines range is 100 to 125 months' imprisonment. PSR ¶ 8. However, Probation calculates the Guidelines range as 140 to

Hon. Kimba M. Wood
June 25, 2021

Page 2

175 months' imprisonment, based on its conclusion that—because Brea was on parole at the time he committed this offense—he has ten criminal history points and is in criminal history category V, not criminal history category IV (as stipulated in the plea agreement). *See* PSR ¶ 82.

B. Discussion

For the reasons discussed below, a sentence within the stipulated Guidelines range of 100 to 125 months' imprisonment is necessary to reflect the seriousness of the offense, Brea's history and characteristics, the need to adequately deter criminal conduct, and the need to protect the public.

1. Applicable Law

As the Court is well aware, district courts must treat the Sentencing Guidelines as the "starting point and the initial benchmark" in sentencing proceedings. *Gall v. United States*, 552 U.S. 38, 46 (2007). After that calculation, the Court must consider the seven factors outlined in 18 U.S.C. § 3553, which include the nature and circumstances of the offense, the individual characteristics of the defendant, the need to adequately deter criminal conduct and promote respect for the law, and the need to protect the public from further crimes of the defendant. *Id.* at 50 & n.6.

2. A Within-Guidelines Sentence Is Necessary

The Government respectfully submits that a sentence within the stipulated Guidelines range of 100 to 125 months' imprisonment would be fair and appropriate. First, Brea committed an incredibly serious crime. He sold more than 280 grams of crack, facilitating his customers' addictions to a dangerous substance and placing them and his community at great risk. Some of Brea's co-conspirators also possessed firearms in furtherance of the conspiracy, greatly increasing the threat posed by the drug trafficking organization. PSR ¶ 17. And Brea was a major player in the organization. He held a leadership role, overseeing and re-supplying the crack supply and managing the shifts during which co-conspirators sold drugs out of the store. PSR ¶ 18. A within-Guidelines sentence is therefore appropriate to reflect the seriousness of the offense, to promote respect for the law, and to provide just punishment for the offense.

Second, Brea's history and characteristics justify a sentence within the stipulated Guidelines range. This is Brea's fourth criminal conviction, and his third drug-related conviction. In 2009, Brea was convicted of criminal possession of a narcotic drug in the fourth degree, and sentenced to 1 to 3 years' imprisonment. PSR ¶ 39. Brea later violated the conditions of his parole. PSR ¶ 39. In 2011, Brea was convicted of criminal possession of a weapon in the fourth degree and sentenced to 6 months' imprisonment, in connection with an incident in which he possessed brass knuckles and a gravity knife and in which he attempted to evade arrest. PSR ¶ 40. In 2014, Brea was convicted of criminal sale of a controlled substance in the third degree and sentenced to 18 months' imprisonment. PSR ¶ 41. He violated his parole a second time in 2016. Then, from 2016 to 2019, Brea committed the instant offense, including while he was still on parole. *See* PSR

Hon. Kimba M. Wood
June 25, 2021

Page 3

p. 21 (“Brea is a repeat offender who has failed to benefit from a prior term of imprisonment and committed the instant offense while under parole supervision.”). Following his arrest in this case, Brea has twice been disciplined in prison, for possessing a dangerous weapon and for interfering with a BOP staff member’s official duties. PSR ¶¶ 11-12. In sum, Brea has repeatedly engaged in criminal conduct (including drug trafficking and possession of weapons), has repeatedly violated parole conditions, and has broken the rules in prison as well. A within-Guidelines sentence is therefore necessary to reflect his history and characteristics.

Third, the compelling need for both specific and general deterrence justifies a within-Guidelines sentence. Brea’s prior interactions with the criminal justice system were clearly insufficient to deter him from committing new crimes. The Court should impose a sentence that, unlike Brea’s prior punishments, ensures that he—and others like him—do not make these types of choices again.

Fourth, a sentence within the stipulated Guidelines range is justified by the need to protect the public. Brea’s history of drug trafficking and weapon possession demonstrates his danger to the community. There is a significant risk that, upon his release, Brea will once again return to selling drugs and possessing weapons. A within-Guidelines sentence is therefore necessary to protect the public.

C. Conclusion

For the reasons set forth above, a sentence within the stipulated Guidelines range of 100 to 125 months’ imprisonment would be fair and appropriate in this case.

Respectfully submitted,

AUDREY STRAUSS
United States Attorney for the
Southern District of New York

By: /s/
Jim Ligtenberg
Assistant United States Attorney
(914) 993-1953

cc: James M. Roth, Esq. (by ECF)

Lt. Richard Mantellino
Legal Bureau – FOIL Unit
One Police Plaza, Room 110-C
New York, NY 10038

Daniel Sullivan
106 valentine Lane Apt 1E
Yonkers, Ny 10705

July 31, 2021

Dear Lt. Mantellino

Under the provisions of the New York Freedom of Information Law, Article 6 of the Public Officers Law, I hereby request a copy of records or portions thereof pertaining to Ivan Brea D.O.B 02/13/91 with arrest date's in the years of 2009 for criminal possession of narcotics, 2011 for criminal possession of a weapon and for criminal sale of a controlled substance.

I am respectfully requesting any police reports, supplementary reports and accusatory reports that is in possession or control of the New York City Police Department, with the name Ivan Brea D.O.B 02/13/91 with arrest date's in the years of 2009 for criminal possession of narcotics, 2011 for criminal possession of a weapon and for criminal sale of a controlled substance attached them.

Respectfully Submitted,





POLICE DEPARTMENT
LEGAL BUREAU
F.O.I.L Unit, Room 110C
One Police Plaza
New York, NY 10038

Daniel Sullivan
106 VALENTINE LANE
1E
YONKERS, NY, 10705

August 6, 2021

FOIL Request #: FOIL-2021-056-11872
Your File #: IVAN BREA 02/13/1991

Dear Sir or Madam:

This is in response to your request received by this office on August 5, 2021 in which you requested access to certain records under the New York State Freedom of Information Law (FOIL).

Your request has been assigned to Principal II Ellis (646-610-6436) of this office. Before a determination can be rendered, further review is necessary to assess the potential applicability of exemptions set forth in FOIL, and whether the records can be located. I estimate that this review will be completed, and a determination issued within 90 business days of this letter.

This is not a denial of the records you requested. Should your request be denied in whole or in part, you will then be advised in writing of the reason for any denial, and the name and address of the Records Access Appeals Officer.

Note: Due to issues caused by the COVID-19 pandemic there may be extensive delays, lasting up to one year, in determining your request.

Very truly yours,

A handwritten signature in black ink, appearing to read "LT R. Mantellino".

Richard Mantellino
Lieutenant
New York City Police Department (NYPD)



POLICE DEPARTMENT
LEGAL BUREAU
F.O.I.L Unit, Room 110C
One Police Plaza
New York, NY 10038

Daniel Sullivan
106 VALENTINE LANE
1E
YONKERS, NY, 10705

August 12, 2021

FOIL Request #: FOIL-2021-056-11872
Your File #:

Dear Sir or Madam:

This is in response to your request received by this office on August 5, 2021 in which you requested access to certain records under the New York State Freedom of Information Law (FOIL).

I must deny access to the records you requested on the basis of Public Officers Law Section 87(2)(a). These records are sealed under court order, pursuant to Criminal Procedure Law Section 160.50 and can only be requested by the arrested person or their representative.

In order to release these records, this unit must receive a notarized affidavit from the arrested person or their representative within thirty (30) days of the date of this letter, addressed to the attention of Principal II Ellis (646-610-6436), who has been assigned to handle your case. Failure to do so will result in this file being CLOSED.

You must notify this unit of any changes to address. Failure to do so will render this unit unable to give you the document(s) you requested.

Very truly yours,

A handwritten signature in black ink, appearing to read "R. Mantellino".

Richard Mantellino
Lieutenant
New York City Police Department (NYPD)


[Services](#) [News](#) [Government](#) [Local](#)

Department of Corrections and Community Supervision

Inmate Information

Inmate Information Data Definitions are provided for most of the elements listed below. When a detailed definition is available for a specific element, you may click on the element's label to view it.

Identifying and Location Information As of 01/07/20

<u>DIN (Department Identification Number)</u>	14R1707
<u>Inmate Name</u>	BREA, IVAN
<u>Sex</u>	MALE
<u>Date of Birth</u>	02/13/1991
<u>Race / Ethnicity</u>	HISPANIC
<u>Custody Status</u>	RELEASED
<u>Housing / Releasing Facility</u>	HALE CREEK ASACTC
<u>Date Received (Original)</u>	06/20/2014
<u>Date Received (Current)</u>	06/20/2014
<u>Admission Type</u>	
<u>County of Commitment</u>	NEW YORK
<u>Latest Release Date / Type (Released Inmates Only)</u>	06/19/15 PAROLE - COND REL TO PAROLE

Crimes of Conviction

If all 4 crime fields contain data, there may be additional crimes not shown here. In this case, the crimes shown here are those with the longest sentences.

As of 01/07/20

Crime	Class
CRIM SALE CONTR SUBSTANCE 3RD	B

Sentence Terms and Release Dates

Under certain circumstances, an inmate may be released prior to serving his or her minimum term and before the earliest release date shown for the inmate.

As of 01/07/20

<u>Aggregate Minimum Sentence</u>	0001 Years, 03 Months, 12 Days
<u>Aggregate Maximum Sentence</u>	0001 Years, 06 Months, 00 Days
<u>Earliest Release Date</u>	
<u>Earliest Release Type</u>	
<u>Parole Hearing Date</u>	
<u>Parole Hearing Type</u>	FULL MAXIMUM
<u>Parole Eligibility Date</u>	09/08/2014
<u>Conditional Release Date</u>	NONE
<u>Maximum Expiration Date</u>	07/23/2017
<u>Maximum Expiration Date for Parole Supervision</u>	
<u>Post Release Supervision Maximum Expiration Date</u>	07/23/2017
<u>Parole Board Discharge Date</u>	11/23/2016

Department of Corrections and Community Supervision

Lt. Richard Mantellino
Legal Bureau – FOIL Unit
One Police Plaza, Room 110-C
New York, NY 10038

Daniel Sullivan
106 valentine Lane Apt 1E
Yonkers, Ny 10705

RE: Foil Request

Dear Lt. Mantellino

Under the provisions of the New York Freedom of Information Law, Article 6 of the Public Officers Law, I hereby request a copy of records or portions thereof pertaining to Jonathan Santos D.O.B June 16, 1986.

I am respectfully requesting any police reports, supplementary reports and accusatory reports that is in possession or control of the New York City Police Department, with the name Jonathan Santos D.O.B June 16, 1986 attached to them.

Respectfully Submitted,





POLICE DEPARTMENT
LEGAL BUREAU
F.O.I.L Unit, Room 110C
One Police Plaza
New York, NY 10038

Daniel Sullivan
106 Valentine Lane
Apt 1E
Yonkers, NY, 10705

September 24, 2020

FOIL Request #: FOIL-2020-056-14188
Your File #: Jonathan Santos

Dear Sir or Madam:

This is in response to your request received by this office on September 21, 2020 in which you requested access to certain records under the New York State Freedom of Information Law (FOIL).

Your request has been assigned to Principal II Ellis (646-610-6436) of this office. Before a determination can be rendered, further review is necessary to assess the potential applicability of exemptions set forth in FOIL, and whether the records can be located. I estimate that this review will be completed, and a determination issued within 90 business days of this letter.

This is not a denial of the records you requested. Should your request be denied in whole or in part, you will then be advised in writing of the reason for any denial, and the name and address of the Records Access Appeals Officer.

Note: Due to issues caused by the COVID-19 pandemic there may be extensive delays, lasting up to one year, in determining your request.

Very truly yours,

A handwritten signature in black ink, appearing to read "R. Mantellino".

Richard Mantellino
Lieutenant
New York City Police Department (NYPD)



POLICE DEPARTMENT
LEGAL BUREAU
F.O.I.L Unit, Room 110C
One Police Plaza
New York, NY 10038

Daniel Sullivan
106 Valentine Lane
Apt 1E
Yonkers, NY, 10705

October 23, 2020

FOIL Request #: FOIL-2020-056-14188
Your File #:

Dear Sir or Madam:

This letter is in response to your request received by this office on September 21, 2020 in which you requested access to certain records under the New York State Freedom of Information Law (FOIL).

Responsive to your request, the following document(s) have been accessed and photocopied:
NYPD West reports

Redactions have been made to the document(s) in that the release of such information would represent an unwarranted invasion of person privacy and would endanger the life and safety of any person {§87.2 (b) and (f)}.

For the following requested item(s), I must refer you to the appropriate agency/agencies or unit that may be in possession of such documents:

In total, 9 page(s) have been copied. Please remit payment in the amount of \$No charge within thirty (30) days. Failure to do so will result in this file being CLOSED.

The case folder contained records that did not directly pertain to the accident. Such records are not included in the enclosed CD/DVD-ROM.

The requested documents are enclosed with this letter.

Upon receipt of payment, the requested documents will be mailed.

PAYMENT PROCEDURE

Send check or money order (no cash) payable to the "New York City Police Department"

Mail payment to:

New York Police Department, F.O.I.L. Unit, Room 110C, One Police Plaza, New York, NY
10038

Note: Please include the FOIL number on the check or money order

APPEAL PROCEDURE

Should you so desire, you may appeal this decision or any portion thereof. Such an appeal must be made in writing, within thirty (30) days of the date of this letter, and must be forwarded to:

Sergeant Jordan S. Mazur, Records Appeals Officer, New York City Police Department, One Police Plaza, Room 1406, New York, NY 10038

Or emailed to foilappeals@nypd.org include copies of the FOIL request and this letter with your appeal.

Very truly yours,



Richard Mantellino
Lieutenant
New York City Police Department (NYPD)


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Department of Corrections and Community Supervision

 Visitors ► *Inmate Lookup*

Inmate Lookup

Inmate Information

Inmate Information Data Definitions are provided for most of the elements listed below. When a detailed definition is available for a specific element, you may click on the element's label to view it.

Identifying and Location Information

As of 09/17/20

<u>DIN</u> (Department Identification Number)	16R2725
Inmate Name	SANTOS, JONATHAN
Sex	MALE
Date of Birth	06/16/1986
<u>Race / Ethnicity</u>	HISPANIC
<u>Custody Status</u>	RELEASED
<u>Housing / Releasing Facility</u>	QUEENSBORO

<u>Date Received (Original)</u>	10/17/2016
<u>Date Received (Current)</u>	10/17/2016
<u>Admission Type</u>	
<u>County of Commitment</u>	NEW YORK
<u>Latest Release Date / Type (Released Inmates Only)</u>	05/24/18 PAROLE - COND REL TO PAROLE

Crimes of Conviction

If all 4 crime fields contain data, there may be additional crimes not shown here. In this case, the crimes shown here are those with the longest sentences.

As of 09/17/20

Crime	Class
ASSAULT 2ND	D
CRIM POSS CONTR SUBSTANCE 3RD	B

Sentence Terms and Release Dates

Under certain circumstances, an inmate may be released prior to serving his or her minimum term and before the earliest release date shown for the inmate.

As of 09/17/20

<u>Aggregate Minimum Sentence</u>	0000 Years, 00 Months, 00 Days

<u>Aggregate Maximum Sentence</u>	0002 Years, 00 Months, 00 Days
<u>Earliest Release Date</u>	
<u>Earliest Release Type</u>	
<u>Parole Hearing Date</u>	03/2018
<u>Parole Hearing Type</u>	RELEASE CONDITIONS
<u>Parole Eligibility Date</u>	
<u>Conditional Release Date</u>	05/24/2018
<u>Maximum Expiration Date</u>	09/08/2018
<u>Maximum Expiration Date for Parole Supervision</u>	
<u>Post Release Supervision Maximum Expiration Date</u>	05/24/2020
<u>Parole Board Discharge Date</u>	

Department of Corrections and Community Supervision

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Marte - Direct by Mr. Adelsberg

127

1 met up with him. Tito waited for him in the building. Tito --
2 when I got to the ninth floor, Tito took out a gun on him, and
3 we took the drugs, and we just left.

4 Q. Was anyone hurt during that robbery?

5 A. No.

6 Q. Turning now to the third robbery, when did that
7 robbery occur?

8 A. 2014.

9 Q. How much did you steal during that robbery?

10 A. \$10,000.

11 Q. Who did you do it with?

12 A. Some guy named Bodie.

13 Q. Who is Bodie?

14 A. Jonathan Santos.

15 Q. How did you know Jonathan Santos?

16 A. He is a guy -- a guy from the neighborhood that
17 Virginia and I grew up with.

18 Q. What happened during this third robbery?

19 A. I used to deal with some guy. I used to buy kilos of
20 cocaine from him, and he used to buy from me sometimes. One
21 time he told me he needed one, so I told him I was going to give
22 it -- sell it to him. So I met up with him in a building. When
23 he went in the building, the stairs, Bodie was waiting for him,
24 and we took the money he had on him, and we just left.

25 Q. Was anyone hurt?

1 A. No.

2 Q. When did the fourth robbery occur?

3 A. 2015.

4 Q. How much did you steal during that robbery?

5 A. A kilo of cocaine.

6 Q. What's the name of the person you did that robbery
7 with?

8 Q. A. Tito.

9 Q. What happened during the fourth robbery?

10 A. A guy I used to buy drugs from told me, he was moving
11 to another country. I knew I wasn't ever going to see him
12 again, so I was being selfish, so I told him I needed a kilo of
13 cocaine and met up with him in a building. Tito waited for us
14 in the last floor, and when we got there, Tito took out a gun on
15 him and just took the kilo and left.

16 Q. Was anyone hurt?

17 A. No.

18 Q. When did the fifth robbery occur?

19 A. Around the same time, 2015.

20 Q. How much did you steal during that robbery?

21 A. Kilo of cocaine.

22 Q. What's the name of the person you did that robbery
23 with?

24 A. Bodie. → WASN'T HE INCARCERATED BY THIS TIME?

25 Q. What happened during this robbery?

Jonathan
Santos
06/16/1986
16-R-2725

ID Name
Page 13
Line 14

	New York City Police Department Omniform System - Arrests								
RECORD STATUS: NYSID ENTERED		Arrest ID: M16608633 - P							
Arrest Location: FRONT OF 97 ELLWOOD STREET APT:		Pct: 034							
Arrest Date: 02-03-2016 Processing Type: ON LINE Current Location of Perpetrator: Time: 10:20:00 DCJS Fax Number: MO005516 Borough: Manhattan Sector: C Special Event Code: NO - Type: ALL PD LOCATIONS Strip Search Conducted: NO DAT Number: Location: 034 PRECINCT Viper Initiated Arrest: NO ICAD# Stop And Frisk: NO Return Date: 0000-00-00 Serial #: 0000-000-0000									
COMPLAINTS:		Arrest #: M16608633							
COMPLAINT NUMBER REPORT DATE RECORD STATUS OCCUR DATE OCCUR TIME 2016-034-00660 2016-02-03 Valid, Initial Arrests made 2016-02-03 09:50									
CHARGES:		Arrest #: M16608633							
CHARGE ATTEMPT? LAW CODE CLASS TYPE COUNTS DESCRIPTION TOP No PL 220.16 01 F B 1 CPC-3RD:NARC DRUG INT/SELL #02 No PL 221.20 F E 1 CRIM POSS MARIHUANA-3RD:>8 OZ									
How Arrest came about:									
Blood Specimen Taken:	Blood Specimen Refused:	Urine Specimen Taken:	Urine Specimen Refused:	Oral Fluid Specimen Taken:	Oral Fluid Specimen Refused:	Breath Sample Refused:	Breath Sample Reading:	Reason Vehicle Not Forfeit:	
Role: IDTU Technician	Department:	Tax:	Command:	Shield:	Rank:	Last Name:	First Name:	MI:	IDTU/Blood Case No:
Role: Point Person	Department:	Tax:	Command:	Shield:	Rank:	Last Name:	First Name:	MI:	
Role: Sup in Charge of Checkpoint	Department:	Tax:	Command:	Shield:	Rank:	Last Name:	First Name:	MI:	
DETAILS:			Arrest #: M16608633						
AT T/P/O SUBJECT WAS FOUND TO BE IN POSSESSION OF A QUANTITY OF COCAINE AND MARIJUANA.									
DEFENDANT: SANTOS, JONATHAN					NYSID #: [REDACTED]		Arrest #: M16608633		
Nick/AKA/Maiden: Sex: MALE Race: WHITE HISPANIC Age: 29 Date Of Birth: 06/16/1986 U.S. Citizen: YES Place Of Birth: USA Is this person not Proficient in English?: NO If Yes, Indicate Language: Accent: NO					Height: 5FT 9IN Weight: 216 Eye Color: BROWN Hair Color: BLACK Hair Length: SHORT Hair Style: CAESAR Skin Tone: MEDIUM Complexion: CLEAR Soc.Security #: 114-70-2005 Occupation: NONE				
					Order Of Protection: NO Issuing Court: Docket #: Expiration Date: Relation to Victim: STRANGER Living together: NO Can be Identified: YES Gang/Crew Affiliation: NO				

Identification ID: Identification #:	Physical Condition: APPARENTLY NORMAL Drug Used: NONE	Lic/Permit Type: Lic/Permit No:	Name: Identifiers:
LOCATION ADDRESS CITY STATE/CNTRY ZIP APT/ROOM PCT HOME-PERMANENT 97 ELLWOOD STREET MANHATTAN NEW YORK [REDACTED] 034			
Phone # and E-Mail Address:			
N.Y.C.H.A. Resident: NO N.Y.C. Housing Employee: NO On Duty: NO Development: N.Y.C. Transit Employee: NO			
Physical Force: NONE			
Gun: Weapon Used/Possessed: NONE Non-Firearm Weapon: Other Weapon Description:			
Make: Recovered: NO Color: Serial Number Defaced: Caliber: Serial Number: Type: Discharged: NO			
Used Transit System: NO Station Entered: Time Entered: Metro Card Type: Metro Card Used/Poses: Card #:			
CRIME DATA	DETAILS		
MODUS OPERANDI	UNKNOWN		
ACTIONS TOWARD VICTIM UNK			
CLOTHING	ACCESSORIES - SWEAT / JOGGING CLOTHES - BLACK		
CLOTHING	FOOTWEAR - SNEAKERS - BLACK		
CLOTHING	OUTERWEAR - T-SHIRT OR TANK TOP - BLACK		
CLOTHING	HEADGEAR - UNK - UNKNOWN COLOR		
CHARACTERISTICS	BEARDED		
BODY MARKS	-UNKNOWN		
BODY MARKS	-UNKNOWN		
IMPERSONATION	UNKNOWN		
JUVENILE DATA:		Arrest #: M16608633	
Relative Notified: Personal Recog: Number Of Priors: 0 Name: School Attending: Phone Called: Mother's Maiden Name: Time Notified:			
ASSOCIATED ARRESTS:		Arrest #: M16608633	
ARREST ID COMPLAINT # [REDACTED]			
No Vehicles for Arrest #			
DEFENDANTS CALLS:		Arrest #: M16608633	
CALL # NUMBER DIALED NAME - PROVIDED BY DEFENDANT NAME AS LISTED IN CELL PHONE RELATIONSHIP CALL COMPLETED			
1 -- REFUSED,REFUSED			
INVOICES:		Arrest #: M16608633	

<u>INVOICE#</u>	<u>COMMAND</u>	<u>PROPERTY TYPE</u>	<u>VALUE</u>
1000755872 034		DRUGS/NARCOTICS	
1000755873 034		CURRENCY - US	
1000755875 034		MARIJUANA/HASHISH	
1000755876 034		TELEPHONE (SEIZURE)	
1000755878 034		NARCOTIC PARAPHENALIA	

ARREST RULES:	Arrest #: M16608633
----------------------	----------------------------

ARRESTING OFFICER: DT3 COREY GRESKO		Arrest #: M16608633
Tax Number: 932745 Other ID (non-NYPD): 0 Shield: 1660 Department: NYPD Command: 580		Force Used: NO - No Force Used by any MOS On Duty: YES In Uniform: NO Squad: NS Chart: 08 Primary Assignment: INVESTIGATIVE
		Type: Reason: Officer Injured: NO Officer Body Worn Camera: TRI Number: 0000-000-00000 Suffix: 0

Arresting Officer Name: DT3 GRESKO, COREY	Tax #: 932745	Command: 580	Agency: NYPD
Supervisor Approving: SGT DALY CHRISTOP	Tax #: 922204	Command: 580	Agency: NYPD
Report Entered by: DT3 GRESKO, COREY	Tax #: 932745	Command: 580	Agency: NYPD

END OF ARREST REPORT M16608633			
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	New York City Police Department Omniuniform System - Arrests.								
RECORD STATUS: NYSID ENTERED		Arrest ID: M16608634 - N							
Arrest Location: INSIDE OF 4295 BROADWAY		Pct: 034							
Arrest Date: 02-03-2016 Processing Type: ON LINE Current Location of Perpetrator: Time: 11:45:00 DCJS Fax Number: MO005517 Borough: Manhattan Sector: B Special Event Code: NO - Type: ALL PD LOCATIONS Strip Search Conducted: NO DAT Number: Location: 034 PRECINCT Viper Initiated Arrest: NO ICAD# Stop And Frisk: NO Return Date: 0000-00-00 Serial #: 0000-0000-0000									
COMPLAINTS:		Arrest #: M16608634							
COMPLAINT NUMBER REPORT DATE RECORD STATUS OCCUR DATE OCCUR TIME 2016-034-05151 2015-09-26 Valid, Initial Arrests made 2015-09-26 04:35									
CHARGES:		Arrest #: M16608634							
CHARGE ATTEMPT? LAW CODE CLASS TYPE COUNTS DESCRIPTION TOP No PL 120.06 F C 1 GANG ASSAULT 2ND DEGREE									
How Arrest came about:		# Injuries: 00	# Fatalities: 00	Test Given:		Reason Vehicle Not Forfeit:			
Blood Specimen Taken:	Blood Specimen Refused:	Urine Specimen Taken:	Urine Specimen Refused:	Oral Fluid Specimen Taken:	Oral Fluid Specimen Refused:	Breath Sample Refused:	Breath Sample Reading:	BrAC:	
Role: IDTU Technician	Department:	Tax:	Command:	Shield:	Rank:	Last Name:	First Name:	MI:	IDTU/Blood Case No:
Role: Point Person	Department:	Tax:	Command:	Shield:	Rank:	Last Name:	First Name:	MI:	
Role: Supv in Charge of Checkpoint	Department:	Tax:	Command:	Shield:	Rank:	Last Name:	First Name:	MI:	
DETAILS:					Arrest #: M16608634				
AT T/P/O DEFT DID STRIKE THE C/V WITH A METAL BAR, ALONG WITH APPROXIMATELY THREE UNIDENTIFIED OTHERS WHO ALSO TOOK PART IN THE ASSAULT, CAUSING THE C/V TO SUFFER A BROKEN RIGHT ARM.									
DEFENDANT: SANTOS, JONATHAN					NYSID #:		Arrest #: M16608634		
Nick/AKA/Maiden: NONE Sex: MALE Race: WHITE HISPANIC Age: 29 Date Of Birth: 06/16/1986 U.S. Citizen: YES Place Of Birth: USA Is this person not Proficient in English?: NO If Yes, Indicate Language: Accent: NO			Height: 5FT 10IN Weight: 216 Eye Color: BROWN Hair Color: BLACK Hair Length: SHORT Hair Style: CLOSE CUT Skin Tone: MEDIUM Complexion: CLEAR Soc.Security #: 114-70-#: 2005 Occupation: NONE			Order Of Protection: NO Issuing Court: Docket #: Expiration Date: Relation to Victim: UNKNOWN/NONE Living together: NO Can be Identified: NO Gang/Crew Affiliation: NO			

ARREST Report - M16608634

Page 2 of 3

NYS DMV Non- Identification ID: Driver Photo Identification Identification:  Physical Condition: APPARENTLY NORMAL Drug Used: NONE		Name: Identifiers:																								
LOCATION <u>ADDRESS</u> <u>CITY</u> <u>STATE/CNTRY ZIP</u> <u>APT/ROOM PCT</u> HOME-PERMANENT 97 ELLWOOD STREET MANHATTAN NEW YORK 10034-034																										
Phone # and E-Mail Address: 																										
N.Y.C.H.A. Resident: NO N.Y.C. Housing Employee: NO On Duty: Development: N.Y.C. Transit Employee: NO																										
Physical Force: <u>NONE</u>																										
Gun: Weapon Used/Possessed: USED/DISPLAYED Make: Recovered: NO Non-Firearm Weapon: Color: Serial Number Defaced: Other Weapon Description: Caliber: Serial Number: Type: Discharged: NO																										
Used Transit System: NO Station Entered: Time Entered: Metro Card Type: Metro Card Used/Posses: Card #:																										
CRIME DATA <table> <tr> <td>MODUS OPERANDI</td> <td>DETAILS</td> </tr> <tr> <td>UNKNOWN</td> <td></td> </tr> <tr> <td colspan="2">ACTIONS TOWARD VICTIM STRUCK WITH OBJECT</td> </tr> <tr> <td>CLOTHING</td> <td>ACCESSORIES - JEANS - BLACK</td> </tr> <tr> <td>CLOTHING</td> <td>FOOTWEAR - SNEAKERS - BLACK</td> </tr> <tr> <td>CLOTHING</td> <td>OUTERWEAR - T-SHIRT OR TANK TOP - BLACK</td> </tr> <tr> <td>CLOTHING</td> <td>HEADGEAR - UNK - UNKNOWN COLOR</td> </tr> <tr> <td>CHARACTERISTICS</td> <td>BEARDED</td> </tr> <tr> <td>CHARACTERISTICS</td> <td>MUSTACHE</td> </tr> <tr> <td>BODY MARKS</td> <td>-UNKNOWN</td> </tr> <tr> <td>BODY MARKS</td> <td>-UNKNOWN</td> </tr> <tr> <td>IMPERSONATION</td> <td>UNKNOWN</td> </tr> </table>			MODUS OPERANDI	DETAILS	UNKNOWN		ACTIONS TOWARD VICTIM STRUCK WITH OBJECT		CLOTHING	ACCESSORIES - JEANS - BLACK	CLOTHING	FOOTWEAR - SNEAKERS - BLACK	CLOTHING	OUTERWEAR - T-SHIRT OR TANK TOP - BLACK	CLOTHING	HEADGEAR - UNK - UNKNOWN COLOR	CHARACTERISTICS	BEARDED	CHARACTERISTICS	MUSTACHE	BODY MARKS	-UNKNOWN	BODY MARKS	-UNKNOWN	IMPERSONATION	UNKNOWN
MODUS OPERANDI	DETAILS																									
UNKNOWN																										
ACTIONS TOWARD VICTIM STRUCK WITH OBJECT																										
CLOTHING	ACCESSORIES - JEANS - BLACK																									
CLOTHING	FOOTWEAR - SNEAKERS - BLACK																									
CLOTHING	OUTERWEAR - T-SHIRT OR TANK TOP - BLACK																									
CLOTHING	HEADGEAR - UNK - UNKNOWN COLOR																									
CHARACTERISTICS	BEARDED																									
CHARACTERISTICS	MUSTACHE																									
BODY MARKS	-UNKNOWN																									
BODY MARKS	-UNKNOWN																									
IMPERSONATION	UNKNOWN																									
JUVENILE DATA:		Arrest #: M16608634																								
Relative Notified: Personal Recog: Number Of Priors: 0 Name: School Attending: Phone Called: Mother's Maiden Name: Time Notified:																										
ASSOCIATED ARRESTS:		Arrest #: M16608634																								
ARREST ID COMPLAINT #																										
No Vehicles for Arrest #																										
DEFENDANTS CALLS:		Arrest #: M16608634																								
CALL # <u>NUMBER DIALED</u> <u>NAME - PROVIDED BY DEFENDANT</u> <u>NAME AS LISTED IN CELL PHONE</u> <u>RELATIONSHIP</u> <u>CALL COMPLETED</u> 1 -- REFUSED,REFUSED																										

INVOICES:		Arrest #: M16608634	
INVOICE# COMMAND PROPERTY TYPE VALUE			
ARREST RULES:		Arrest #: M16608634	
ARRESTING OFFICER: DT3 JOHN SCOZZAFAVA		Arrest #: M16608634	
Tax Number: 923148 Other ID (non-NYPD): 0 Shield: 4231 Department: NYPD Command: 255		On Duty: YES In Uniform: NO Squad: B Chart: 08 Primary Assignment: INVESTIGATIVE	
		Force Used: NO - No Force Used by any MOS Type: Reason: Officer Injured: NO Officer Body Worn Camera: TRI Number: 0000-000-00000 Suffix: 0	
Arresting Officer Name: DT3 SCOZZAFAVA, JOHN		Tax #: 923148	Command: 255
Supervisor Approving: SGT BLACK THOMAS		Tax #: 923563	Command: 255
Report Entered by: DT3 SCOZZAFAVA, JO		Tax #: 923148	Command: 255
END OF ARREST REPORT M16608634			

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	New York City Police Department Omniform System - Arrests								
RECORD STATUS: NYSID ENTERED		Arrest ID: M16608644 - J							
Arrest Location: INSIDE OF 4295 BROADWAY		Pct: 034							
Arrest Date: 02-03-2016 Processing Type: ON LINE Current Location of Perpetrator: Time: 11:45:00 DCJS Fax Number: MO005526 Borough: Manhattan Sector: B Special Event Code: NO - Type: ALL PD LOCATIONS Strip Search Conducted: NO DAT Number: Location: 034 PRECINCT Viper Initiated Arrest: NO ICAD# Stop And Frisk: NO Return Date: 0000-00-00 Serial #: 0000-000-00000									
COMPLAINTS:		Arrest #: M16608644							
COMPLAINT NUMBER REPORT DATE RECORD STATUS		OCCUR DATE OCCUR TIME							
2013-034-01546		2013-03-30 Valid, Initial Arrests made 2013-03-30 03:20							
CHARGES:		Arrest #: M16608644							
CHARGE ATTEMPT? LAW CODE CLASS TYPE COUNTS DESCRIPTION									
TOP No PL 160.10 02A F C 1 ROB-2ND:CAUSES PHYSICAL INJURY #02 No PL 160.05 F D 1 ROBBERY-3RD									
How Arrest came about:									
Blood Specimen Taken:	Blood Specimen Refused:	Urine Specimen Taken:	# Injuries: 00	# Fatalities: 00	Test Given:		Reason Vehicle Not Forfeit:		
Blood Specimen Taken:	Blood Specimen Refused:	Urine Specimen Taken:	Oral Fluid Specimen Refused:	Oral Fluid Specimen Taken:	Breath Sample Refused:	Breath Sample Reading:	BrAC:		
Role: IDTU Technician	Department:	Tax:	Command:	Shield:	Rank:	Last Name:	First Name:	MI:	IDTU/Blood Case No:
Role: Point Person	Department:	Tax:	Command:	Shield:	Rank:	Last Name:	First Name:	MI:	
Role: Supv in Charge of Checkpoint	Department:	Tax:	Command:	Shield:	Rank:	Last Name:	First Name:	MI:	
DETAILS:						Arrest #: M16608644			
THE ABOVE DEFENDANT WAS ARRESTED IN CONNECTION WITH A ROBBERY THAT OCCURRED ON 3/30/2013 INSIDE OF 200 DYCKMAN STREET. DET CASE #2013-417									
DEFENDANT: SANTOS, JONATHAN					NYSID # [REDACTED]		Arrest #: M16608644		
Nick/AKA/Maiden: Height: 5FT 10IN Sex: MALE Weight: 216 Race: WHITE HISPANIC Eye Color: BROWN Age: 29 Hair Color: BLACK Date Of Birth: 06/16/1986 Hair Length: SHORT U.S. Citizen: YES Hair Style: CLOSE CUT Place Of Birth: USA Skin Tone: LIGHT Is this person not Proficient in English?: NO Complexion: CLEAR If Yes, Indicate Language: Accent: NO Soc. Security #:					Order Of Protection: NO Issuing Court: Docket #: [REDACTED] Expiration Date: Relation to Victim: BOYFRIEND Living together: Can be Identified: YES				

NYS DMV Non- Identification ID: Driver Photo Identification Identification # XXXXXXXXXX		Occupation: UNKNOWN	Gang/Crew Affiliation: NO Name: Identifiers:			
Physical Condition: APPARENTLY NORMAL		Lic/Permit Type: Lic/Permit No:				
Drug Used: NONE						
<u>LOCATION</u>	<u>ADDRESS</u>	<u>CITY</u>	<u>STATE/CNTRY</u>	<u>ZIP</u>	<u>APT/ROOM</u>	<u>PCT</u>
HOME-PERMANENT 97 ELLWOOD STREET MANHATTAN NEW YORK XXXXXXXXXX 034						
Phone # and E-Mail Address: CELL: XXXXXXXXXX						
IMEI 9999999999999999	Cell Phone #	Carrier	Other	Make	Model	Insured
N.Y.C.H.A. Resident: NO N.Y.C. Housing Employee: On Duty: Development: N.Y.C. Transit Employee:						
Physical Force: USED						
Gun: Weapon Used/Possessed: NONE Make: Recovered: Non-Firearm Weapon: Color: Serial Number Defaced: Other Weapon Description: Caliber: Serial Number: Type: Discharged: NO						
Used Transit System: NO Station Entered: Time Entered: Metro Card Type: Metro Card Used/Poses: Card #:						
CRIME DATA DETAILS MODUS OPERANDI: PROPERTY SNATCHED FROM HAND ACTIONS TOWARD VICTIM INJURY USING PHYSICAL FORCE CLOTHING ACCESSORIES - JEANS - BLACK CLOTHING FOOTWEAR - SNEAKERS - BLACK CLOTHING OUTERWEAR - T-SHIRT OR TANK TOP - BLACK CLOTHING HEADGEAR - UNK - UNKNOWN COLOR CHARACTERISTICS BEARDED CHARACTERISTICS MUSTACHE BODY MARKS -UNKNOWN BODY MARKS -UNKNOWN IMPERSONATION UNKNOWN						
JUVENILE DATA:				Arrest #: M16608644		
Relative Notified: Personal Recog: Number Of Priors: 0 Name: School Attending: Phone Called: Mother's Maiden Name: Time Notified:						
ASSOCIATED ARRESTS:				Arrest #: M16608644		
ARREST ID COMPLAINT #						
No Vehicles for Arrest #						
DEFENDANTS CALLS:				Arrest #: M16608644		

<u>CALL # NUMBER DIALED NAME - PROVIDED BY DEFENDANT NAME AS LISTED IN CELL PHONE RELATIONSHIP CALL COMPLETED</u>			
1	--	REFUSED,REFUSED	
INVOICES:		Arrest #: M16608644	
<u>INVOICE# COMMAND PROPERTY TYPE VALUE</u>			
ARREST RULES:		Arrest #: M16608644	
ARRESTING OFFICER: DT3 PATRICK MCCLINTOCK		Arrest #: M16608644	
Tax Number: 927170 Other ID (non-NYPD): 0 Shield: 4376 Department: NYPD Command: 255		On Duty: YES In Uniform: NO Squad: A Chart: 08 Primary Assignment: INVESTIGATIVE	
		Force Used: NO - No Force Used by any MOS Type: Reason: Officer Injured: NO Officer Body Worn Camera: TRI Number: 0000-000-00000 Suffix: 0	
Arresting Officer Name: DT3 MCCLINTOCK, PATRICK		Tax #: 927170	Command: 255
Supervisor Approving: SGT BLACK THOMAS		Tax #: 923563	Command: 255
Report Entered by: DT3 MCCLINTOCK, PA		Tax #: 927170	Command: 255
END OF ARREST REPORT M16608644			

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3502-MM

WITNESS
VI GIOVANNI
PREP
MARTE
6/5/18

SA JS
SB BK
MF

- VB told you which days of the week the cash delivery usually arrived
- VB told him a few days before - not the same or the day before
- Sometimes they did deliveries on random days but typically followed a set schedule
- Marke bought marks & gloves but some of the robbers already had ~~protective~~ marks & gloves
- GM went to graphics, communications, arts → Photography School
- Left school & felt like it wasn't for me & was selling weed
- Worked in mother's furniture store at 14th → 18-15
- " Porter → 17-18
- 17 when son was born
- Construction, ~~demolition~~ → 2013-2016 mts - full time
- demolition → 17-18
- Worked at an adult day care 20-23 mts
- Working 7 days/week
- Sold to users, buyers, suppliers
- mostly mafias
- GM worked w/ Smiley, Sandy (Smiley's cousin) & folder's niggle into DR
- Other drug dealer, & the Trinitarios
- Never part of the gang
- 3 shortcuts w/ Trinitarios
- In one fight, GM's friend was stabbed
- Met w/ Jeff ~10 times before robbery.
- Jeff and 2 others once were robbing a guy. Coming out of work saw them, jumped the guy.
- I knew he was about that life
- Initially told him everything; don't remember in first convo if I said bank/cashier but made sure he knew the full story
- told him had insider, but not who it was
 - \$7K → before vacation \$10K → after vacation
 - Moved to mother's house for a few weeks after break up
 - Last contact → Feb 2014



GIOVANNY MARTE RTCC SUMMARY

GM

ACCIDENTS							
Date	Role	Event Id					
01/10/2015	Driver	0035					
ARRESTS							
Date	Law Code	Sealed or Voted	Precinct	Arrest Number (Includes Check Digit)			
01/19/2015	AGGRAVATED UNLIC OPER/MV-3RD	NO	034	M15603787-L			
01/10/2015	AGGRAVATED UNLIC OPER VEH-3RD MV LICENSE VIOL: NO LICENSE	Sealed	034	M15601404-R			
04/22/2009	CSCS-3RD:NARCOTIC DRUG	Sealed	034	M09637114-H			
03/30/2008	CRIM POSS WEAP-4TH:INT TO USE	Sealed	034	M08628618-P			
CJA INTERVIEW							
Date	Charge	Precinct Number					
04/22/2009	CSCS-3	034					
03/30/2008	CRIM POS WEAP-4	034					
C SUMMONS							
Date	Charge	Precinct Number					
06/07/2012	OTHER VTL - 9999	034					
NYC MOVING VIOLATIONS							
Event Date	Ticket Number						
01/19/2015	AAY5107804						
03/07/2014	AAX2404846						
03/07/2014	AAX2404850						
03/07/2014	AAX2404861						
03/07/2014	AAX2404824						
02/20/2014	AAX0563216						
02/20/2014	AAX0563220						
10/07/2012	AAS2088741						
WARRANTS							
Event Date	Type	Charge	Status	Event ID			
03/04/2015	ARREST WARRANT	VTL 0511001	ACTIVE	5740255			
02/26/2015	SUMMONS	VTL 0512000	CLOSED	5737295			
02/02/2015	SUMMONS	VTL 0512000	CLOSED	5724985			



GIOVANNY MARTE EVENT SUMMARY

EVENT SUMMARY	
Data Source	Number of Events
Accidents	1
Aided	0
Arrests	4
CJA Interview	2
C-Summons	1
Complaints	0
Domestic Incident Report	0
I-Cards	0
Juvenile Report	0
Lawman (DMV)	1
Nitro/Kite	0
NYC Doc(City Corrections)	0
NYS Doc(State Corrections)	0
NYC Moving Violations	8
Parking Summons	0
Parole	0
Probation	0
Shootings and Murders	0
Sex Offender (SOMU)	0
Stop Question & Frisk	0
Tab Summons	0
Warrants	6

JEROLD R. RUDERMAN
CHAIRPERSON

**State of New York
Grievance Committee for the
Ninth Judicial District**
CROSSWEST OFFICE CENTER
399 KNOLLWOOD ROAD - SUITE 200
WHITE PLAINS, N.Y. 10603
914-824-5070

DIANA MAXFIELD KEARSE
CATHERINE A. SHERIDAN
ACTING CHIEF COUNSEL

SHARON GURSEN ADES
ACTING DEPUTY CHIEF COUNSEL

FORREST STRAUSS
MATTHEW LEE-RENERT
ANTONIA P. CIPOLLINE
ANTHONY R. WYNNE
GLENN E. SIMPSON
MATTHEW C. TOAL
MICHAEL J. KEARSE
STAFF COUNSEL

PATRICK A. SMITH
INVESTIGATOR

CONFIDENTIAL

October 8, 2021

Virginia Blanco
79564-054
33 ½ Pembroke Road
Danbury, CT 06811

Re: File 35447/18

Dear Ms. Blanco

This office has received your recent correspondence. The Committee notes that the allegations presented arise out of the same criminal matter about which you previously filed a complaint. Your new submissions do not set forth any basis for this office to investigate. The issues concerning the attorney's conduct during the course of the criminal matter, are matters more appropriately addressed through motion practice or appellate review.

Sincerely,

Antonia Cipollone
Antonia Cipollone
Staff Counsel

AC/et

✓cc: Daniel Sullivan

3502-PP

JB MF
SA JM

With prep w/ Mate 6/29

- VB knew that I was dealing drugs since 69
- kept drugs and guns in her apt on Ellwood
- GM was partners w/ Smiley → Smiley would give him Marijuana and Ecstasy pills on consignment from 09
- GM & Smiley → dealing together until early 2011
- committed a shoot out w/ Smiley 3/6 they broke his car window
- Smiley & VB lived together for part of the time down 08-11
- Fight w/ Smiley about drugs - 2011
 - Smiley wasn't being consistent
 - First fight over a spot → Ellwood & 196
 - Smiley lost
- GM & Smiley owned the spot → 3 8 hr shifts
 - landlords & pitchers & managers worked for GM
- ✓ - Only spot that GM had
 - VB told GM that spot was by far Smiley's spot
 - Only sold weed at spot → only
 - had "employees" for weed sales
 - VB would ~~sell~~ give drugs to Smiley's customers after Smiley was busy
 - ~~GM~~ Smiley kept 1lb of weed in VB's house
 - GM had only ounces
 - Wouldn't go to VB's house alone
 - Drug customers would give VB \$ & VB would give drugs
 - Never really spoke w/ Smiley after fight
- ✓ - Spot got raided so they shut it down
- After return to DR got back in to drug selling but didn't really communicate w/ Smiley again
- Summary: VB held drugs for Smiley & GM also and met customers on Smiley's behalf
- VB brought them customers sometimes
- Sometimes he's with VB & Smiley calls to tell her to meet w/ customers
- GM & Smiley would give her \$ for holding & helping w/ the drugs → few \$100 dollars

- Rest DR

- marijuana, pills, & coke
- would keep drugs in Tito's apt or Details
- Drugs in safe box
- Felix & Peter → VB father & Felix mother were sisters
 - VB's cousin - lived on 5th fl in Ellwood
 - GM knew he was selling pills
 - GM ^{first} bought pills from him during summer
 - GM was buying thousands of pills/month from September 2012 - 2016
 - cost from \$5-10 a pill (per set)
 - ~~GM~~ Felix would communicate w/ ~~GM~~ GM ^{down}
VB → They would deal in front of her 1-2/week
 - Felix would give her pills to give to GM more than 20 times → Sept 2012 - Spring 2013
 - prices went up and they stopped dealing w/ him
 - About half the time GM would give ~~to~~ VB \$10 to give ~~back~~ to Felix
 - 2-3 week transactions between GM & Felix

Apt

- probably
- didn't use to be in the neighborhood ^{were} selling drugs

Newleth

- Lived in 90 Ellwood
- 2009-2013/2014
- buying m30s & percosets
- partners w/ GM → GM would give cash
- Sept 2012 - Spring 2013
- ~~partnered~~ ^{partnered} with GM → GM would give drugs to VB to give to ^{GM} Newleth 12x

VB → Transact in front of ~~her~~ → Once every 2 weeks
Friends of Newleth

Shiley → purchased from him since at least 2006
- late 2009 → shot shot

- Grew up in the same neighbourhood
- now her actions began
- in progressed
- she was living w/
- she the got smile
- 1400 → smile
- Smiley → → more or less distribution spot

3502-JJ

91A-NY-3502105 Serial 59

- 1 of 1 -

FD-302 (Rev. 5-8-10)

OFFICIAL RECORD

FEDERAL BUREAU OF INVESTIGATION

Date of entry 08/31/2015

On August 12, 2015, [REDACTED], date of birth [REDACTED], home address [REDACTED], [REDACTED], cellular telephone number [REDACTED], was interviewed by SA Brendan Kenney and TFO Brian Menton in an FBI vehicle. After being advised of the identities of the interviewing agents and the nature of the interview, POLANCO provided the following information:

GIO (known to the FBI as GIOVANNY MARTE) offered to sell [REDACTED] a firearm for \$850.

[REDACTED] saw 50 as recently as a few weeks ago.

[REDACTED] was shown a single photograph of ANDRES CRUZ, date of birth [REDACTED], NYSID [REDACTED]. [REDACTED] reviewed the photograph and immediately identified the individual in the photograph as 50.

A copy of the photograph of CRUZ shown to [REDACTED] is digitally attached.

924c
SEE Page 246 08/142

Investigation on 08/12/2015 at New York, New York, United States (In Person)

File # 91A-NY-3502105 Date drafted 08/13/2015

by KENNEY BRENDAN M, MENTON BRIAN PATRICK

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

BLANCO - 003855

1 of 1

Sadieli Marte

Grew up in same neighborhood, since 2006
hang out outside ~~fr~~ school

VB was dating my brother

Would see them picking up her child from home

Son Adrian - would he bring him to mother

*Lived together, never visited,

*think maybe in Yonkers

Close friend of Yezidet Moranta

Just hi & bye

Lived w/ ~~the~~ mom when they were dating

Often in neighborhood together

Older brother got along w/ VB

Nathaniel is 8 or 9 yrs old

When they arrested Gio, Priscilla an ex- gf told me about it

Ana - older sister lives in CA - moved

Never seen Gio w/ gun

5/3/18
Discovery Disc

Questions for Ms. Marte

Met VB in 2003

live in Washington Heights - Bogardas Place

Elo + VB knew

boyfriend & girlfriend

knowledge since 2011

*they lived together - ~2012; he told me lived in Yonkers
less than 2 years

~ Oct 2014 end of relationship

Would see them in the streets in W.H., Not in my house
Would

Had a little boy at that time - ~6-7 yrs old

always saw Elo w/ boy - always

would see them in the park & on the street

VB she came to my house;

when I opened the door, she came in, sat down, she said

I want to speak to you about something

Said

tell your son that he owes me my cut of the \$

she said wouldn't tell me what they did bc I would be an
something very big at federal level Accomplice

2014 - I remember because just came back from DR

↳ In DR, March of 2013

↳ No H was 2015 - around February

Just the two of them

I begged her

She said again that I would become an accomplice

Called my son - asked him what he did - I told him VB came

He came to house, ~~begged~~ he told me to relax

I said you cause me harm

She didn't say how much \$

Didn't tell him to pay VB. He didn't say anything about VB.
Said he would speak to VB.

Didn't tell anyone else about the conversation

Never seen Gio w/ a gun

*Photos - ~~He~~ found the photos - Gio had them in his bedroom

I kept that photograph

Just those photos

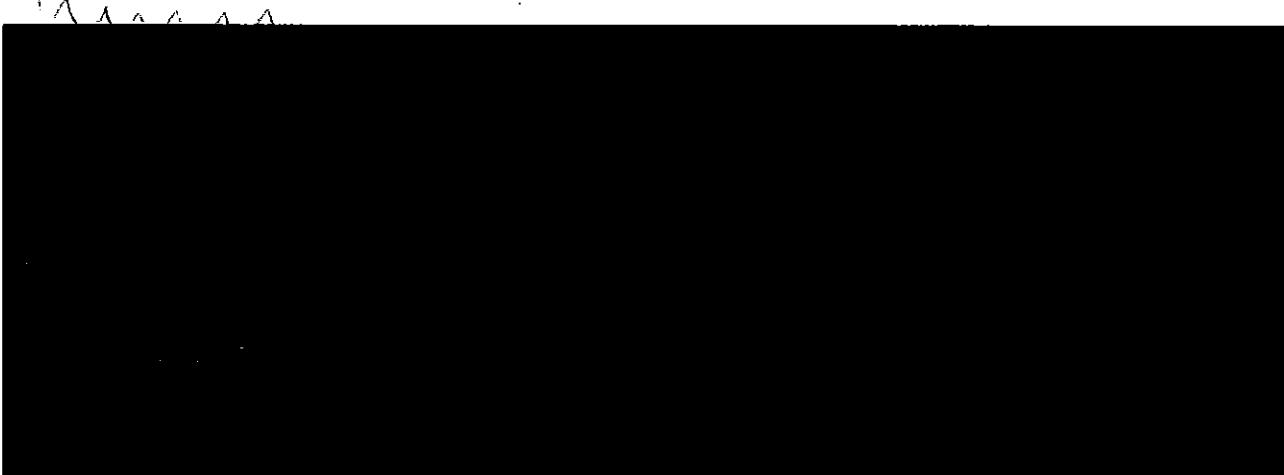
Doesn't know when they were taken

↳ My son's son, & VB, Gio + Virginia

↳ ~~Grand~~ Nathaniel Marte

brother died

Died Feb. 13, 2013



3508-C

Call w/ Johan

Sam Adelsberg
Jay McMahon
Jamie Bagliebter
Brendan Kenney

4/12

Gio's numbers were in his cell

New numbers 1x / month or so

Didn't delete old ones, just added new ones
Don't know any other Giovanni

Grew up ~~in~~ in neighborhood w/ VB

When Gio + VB met, they were young

Went to 21B - VB a bit older than me -
2 yrs older than Gio

Son's father was one of my best friends growing up

↑ also close w/ VB's sister

VB + Gio started dating - lived together at some point
↳ in the Bronx

Gio very private
never visited

Saw Gio w/ her son Adnan

Herbalife Distributor - do free workout classes

Didn't even speak

Told me what happened - was private but told me what happened

told me VB gave him info, when best time, where came in

said ~~over~~ over 300K

Remember seeing him very runaw on the day - afternoon

3508-D

Shannon Becker
Samuel Adelsberg
Jamie Baughebeler
Jay McMahon

Meeting w/ Johan

Glo would take care of VB's son
the sons were close

Photo shop #1 → Mante, VB, Adnan, Mante's Son
#2 → VB + Mante
#3 → VB, Adnan, Nathaniel

First talk w/ Glo → bank robbery, Johan pulling it out
Glo later told me VB worked at Bank
put it together and asked
↳ probably within a month

Knew he was into comm activity but surprised he did this

Knew Jeffrey + SO

Found out about VB couple months later

2nd mtg → who else was involved